

West Berkshire Local Plan Housing Site Allocations Development Plan Document

Consultation Statement October 2015

1. Introduction

1.1. Before the Council submits the Housing Site Allocations Development Plan Document (DPD) to the Secretary of State, it has to comply with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹. One of the requirements of Regulation 19 is that the Council must publish a statement setting out:

- Which organisations and individuals have been invited to have involvement in the preparation of the plan?
- How these organisations and individuals were invited to make their representations?
- A summary of the main issues raised; and
- How those issues have been taken into account in the proposed submission version of the Housing Site Allocations DPD?

1.2 Further to this, the National Planning Policy Framework at paragraph 155² sets out that *“early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”*

1.3 As part of the continued preparation of the West Berkshire Local Plan (the Housing Site Allocations DPD will form part of the Local Plan alongside the adopted Core Strategy DPD), we acknowledge the importance of involving the public and stakeholders at the earliest possible stage and recognise that their involvement should be a continuous process rather than one discrete exercise.

1.4 A key part of the plan preparation process is involving the local community and stakeholders. The Council's Statement of Community Involvement (SCI) (first adopted in 2007 and reviewed in September 2014³) identifies

¹ Town and Country Planning (Local Planning) (England) Regulations 2012:
http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf

² National Planning Policy Framework:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³ West Berkshire Council Statement of Community Involvement (2014):
<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38265&p=0>

the ways people and organisations will be involved in the plan making process of Development Plan Documents

- 1.5 This Consultation Statement outlines the consultation undertaken so far in preparing the Housing Site Allocations Development Plan Document (DPD), how the requirements of Regulation 19 have been addressed, and how this Statement fully complies with the Council's SCI. It provides a record of the consultation methods used and results received at the various stages in the preparation of the plan.

2. Housing Site Allocations DPD preparation process

Initial consultation with Town and Parish Councils on sites identified in the Strategic Housing Land Availability Assessment (SHLAA)

Background:

- 2.1 The SHLAA helps inform the preparation of the Housing Site Allocations DPD by identifying potential housing land. It is a technical assessment, not a policy making document, and as such, is part of the evidence base for the preparation of the Housing Site Allocations DPD. It includes potential housing sites within and adjacent to the larger, more sustainable settlements that are included within the settlement hierarchy set out in the adopted Core Strategy. This is where land will be allocated for new homes within the Housing Site Allocations DPD.

Who was consulted and how were they consulted?

- 2.2 Following the publication of the SHLAA in December 2013⁴, the Council held a series of workshops with the District's Town and Parish Councils in January and February 2014. The purpose of these sessions was to informally discuss the potential housing sites identified in the SHLAA and to gain further information on local issues, community aspirations and preferences for sites. Several ward Members also attended the sessions.

Summary of the main issues raised and how these have been addressed:

- 2.3 Following the events, draft notes of the sessions were sent to the Parish and Town Councils so that they could add any further comments. Information was also sought on recent flooding events. This information is attached in Appendix A, and it was also appended to the Consultation Statement prepared and published at the preferred options stage.
- 2.4 It should be noted that additional information submitted by Cold Ash Parish Council following the workshop (a document entitled 'Development

⁴ Strategic Housing Land Availability Assessment (December 2013):
<http://info.westberks.gov.uk/index.aspx?articleid=28794>

considerations for the parish of Cold Ash and its villages and settlements'), which was omitted in error in the preferred options Consultation Statement, is now included within Appendix A. In addition, the workshop session for Cold Ash started with a joint discussion with Thatcham Town Council about sites THA010, THA011, THA014, THA016, THA019 and THA027. These comments were originally only included within the Cold Ash workshop notes, however they have now been added to the Thatcham workshop notes for completeness.

How have the issues been addressed?

- 2.5 The issues raised by the Parish and Town Councils at the workshops were included within the site assessments which formed part of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Report for the Housing Site Allocations Preferred Options consultation.

Regulation 18 consultation

Background:

- 2.6 As part of the preparation of the Housing Site Allocations DPD the Council is required to formally notify specified bodies and persons of the subject of the DPD and invite them to make representations on what it ought to contain.

Who was consulted and how were they consulted?

- 2.7 The Council invited comments on the proposed scope and content of the Housing Site Allocations DPD for six weeks from Wednesday 30 April to Wednesday 11 June 2014. The Regulation 18 Statement is attached in Appendix B. In accordance with the Council's Statement of Community Involvement (SCI) comments were invited (via email/letter) from everyone who was on the Planning Policy Consultation Database. This is a database of individuals, groups and organisations who we regularly contact on plan making matters that are of interest to them and is reviewed and updated on a continuous basis. Anyone making comments on a DPD is included on the database and is automatically kept informed of plan making matters as appropriate. It includes those specific and general bodies identified in The Town and Country Planning (Local Planning) (England) Regulations 2012.

Summary of the main issues raised and how these have been addressed:

- 2.8 A summary of the representations received and details of how the representations have and will be taken into account in the preparation of the Housing Site Allocations DPD are outlined in Appendix C. A number

of points were made by consultees which raised concerns about the Council's proposed approach to the DPD as set out in the Regulation 18 Statement. In summary, these covered the following issues:

- The Core Strategy figure of 10,500 is out of date and 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 housing 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.

2.9 Careful consideration has been given to all of the points raised during the consultation on the Council's approach to the Housing Site Allocations DPD. The background paper prepared as part of the Preferred Options consultation⁵ clarifies the approach taken by the Council and makes clear how the issues raised at the Regulation 18 stage have been taken into account.

Preferred options consultation

Background:

2.10 Between 25 July and 12 September 2015 a preferred options consultation ran on the Housing Site Allocations DPD which sought views on the soundness of the proposals at this stage. Whilst this was an optional period of consultation, it was the Council's view that it was an important stage because it provided the opportunity for the community and other interested persons to comment at an early stage in the plan making process, whilst also enabling the Council to take views into account before final decisions on the DPD were made.

2.11 The content of the Housing Site Allocations DPD preferred options document⁶ comprised of the following:

- The preferred option housing site allocations for those areas defined by the adopted Core Strategy DPD's settlement hierarchy as urban areas, rural service centres or service villages;

⁵ Housing Site Allocations DPD – Background Paper Preferred Options Consultation July 2014:
<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38034&p=0>

⁶ Housing Site Allocations DPD Preferred Options Consultation July 2014:
<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38035&p=0>.

- The preferred option allocations for the provision of pitches/plots for Gypsies, Travellers and Travelling Showpeople across the district based on identified need;
- An updated policy to guide the redevelopment of Sandford Park;
- Revised residential parking standards; and
- Criteria for settlement boundary review

2.12 Between 19 September and 31 October 2014, the preferred option Policies for Housing in the Countryside were consulted upon. The policies, which will form part of the Housing Site Allocations DPD, set out how housing development in the countryside will be managed through the planning process. The policies also address the potential to convert or redevelop existing buildings in the countryside, and are in line with local and national planning policy. During this consultation period views were sought on the soundness of the policies.

Who was consulted and how were they consulted?

- 2.13 Views on the preferred options Housing Site Allocations DPD (both the preferred options DPD and the Policies for Housing in the Countryside) were invited by the following methods:
- Email to all Council Members (see Appendix D and Appendix L).
 - Publication of consultation documents and comments forms for the development plan document (see Appendix E and Appendix M for a copy of the comments forms). The relevant documents were published on the Council's website^{7 8}; and a small number of hard copies were available as set out below;
 - Email/letter to all consultees on the Planning Policy Consultation Database, all Town and Parish Councils, all neighbouring Town and Parish Councils, all adjacent local authorities and relevant internal officers (see Appendix F and Appendix N for a copy of the letters/emails);
 - Letter to properties within 100m of preferred option site allocations (see Appendix G);
 - Issue of press release (see Appendix H);
 - Copy of the DPD available at the Council's main Market Street office, in all of the districts libraries, and in two Reading libraries close to the district's eastern boundary (Tilehurst and Southcote). A

⁷ Housing Site Allocations Preferred Options Development Plan Document webpage:
<http://info.westberks.gov.uk/index.aspx?articleid=30382>.

⁸ Preferred option policies for housing in the countryside website:
<http://info.westberks.gov.uk/index.aspx?articleid=30475>

covering memo/letter (see Appendix I and Appendix O) was included which outlined why a Housing Site Allocations DPD was being undertaken, the purpose of the preferred options consultation, and the timing of the consultation. The memo/letter also included the address of the appropriate web pages and the contact details for the Planning Policy team.

- 2.14 Prior to the consultation, a letter was sent on 3 July 2015 to the Parish and Town Council clerks with a brief article advising them that it may be of use for circulation lists, websites and parish newsletters (see Appendix J). A poster advertising the consultation was also sent to the Parish and Town Council clerks for display on parish notice boards (see Appendix K).

Summary of the main issues raised and how these have been addressed:

- 2.15 In total 8484 comments were received from 4,488 consultees on the preferred options Housing Site Allocations DPD and a further 165 comments were received from 55 consultees on the preferred options Policies for Housing in the Countryside. Once the comments to the preferred options consultation were received, they were logged, processed and made available to view on the Council's Local Plan Consultation Portal: <http://consult.westberks.gov.uk/portal/hsapreferreduptions>.
- 2.16 In addition, petitions were also received objecting to development on the following sites:
- EUA007, EUA008 and EUA003, EUA031, EUA033: 2,218 signatures (paper).
 - Development in Lambourn: 30 signatures (paper) and 49 signatures (electronic).
 - NEW045: 471 signatures (paper).
 - THA025: 1,850 (paper), 521 (electronic).
 - PAN001 and PAN002: 48 signatures (paper) and 169 signatures (electronic).
- 2.17 A summary of the key issues raised in the representations, together with the Council's responses to these and how these have been addressed are included within Appendices P to U. Copies of the full submissions can be viewed on the Council's Local Plan Consultation Portal at: <http://consult.westberks.gov.uk/portal/hsapreferreduptions>. The full submissions to the preferred option Policies for Housing in the Countryside can be viewed on the Local Plan Consultation Portal at: http://consult.westberks.gov.uk/portal/housing_site_allocations_dpd_preferred_options_policies_for_housing_in_the_countryside.

Housing site selection workshops for Planning Advisory Group and Ward Members:

Background:

- 2.18 Following the preferred options consultation, it was felt necessary by officers to brief members of the Planning Advisory Group and ward Members on the key issues raised in representations, the further technical work undertaken (including Landscape Capacity Assessments and Transport Assessments) to inform site selection, and the emerging officer conclusions and recommendations.

Who was consulted and how were they consulted?

- 2.19 Members of the Planning Advisory Group and ward Members were invited to the workshops held in July 2015. The workshops were grouped by spatial area, with two sessions on 21 July considering the Eastern area (Tilehurst, Calcot, Purley-on-Thames and Theale) and the East Kennet Valley (Burghfield Common, Stratfield Mortimer and Woolhampton). A further two sessions on 28 July covered Newbury/Thatcham/Cold Ash and the North Wessex Downs AONB (Hungerford, Lambourn, Pangbourne, Bradfield Southend, Chieveley, Compton, Great Shefford, Hermitage and Kintbury).
- 2.20 At the workshops, officers outlined the key issues arising from the preferred options consultation and outlined their initial conclusions/recommendations. Planning Advisory Group members and ward Members then discussed the sites and recommendations.

Summary of the main issues raised and how these have been addressed:

- 2.21 Notes of the discussions at the Member workshops are available upon request. The discussion at the workshops has informed the final site assessments for each site. Full site assessments are available within the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Report.

3. Duty to Cooperate

- 3.1 The Council has a Duty to Cooperate when preparing all DPDs. This Duty was introduced in the Localism Act of 2011 and requires us to work with neighbouring authorities and other prescribed bodies (Set out in Part 2 (4(1)) of the Town and Country Planning (Local Planning) (England) Regulations 2012) in preparing DPDs in order to address strategic issues relevant to our area. It requires that we engage constructively, actively and on an ongoing basis to develop strategic policies; and requires us to

consider joint approaches to plan making. At the heart of the Duty is effective partnership working to achieve outcomes. The Council has produced a separate Duty to Cooperate Statement that sets out how the Council has considered joint plan-making arrangements, what decisions were reached and why.

4. Keeping people informed

- 4.1 We keep people informed about the overall progress of the West Berkshire Local Plan in a variety of ways, such as e-mail updates to those on the Planning Policy Consultation Database and updates on our web based planning policy blog. We also produce a Local Plan newsletter. The first one of these was published in December 2013, a second in April 2014, and a third in December 2014. Copies are attached in Appendix V. They were distributed to everyone on the Planning Policy Consultation Database and copies were also made available in the main Council offices and in all libraries across the District.
- 4.2 An email/letter was sent on 28 November 2014 to those on the Planning Policy Consultation Database to provide a progress update on the preparation and timetable of the Housing Site Allocations DPD (see Appendix W).

Appendices

- Appendix A SHLAA consultation with the parish and town councils January-February 2014
- Appendix B Regulation 18 Notice of intention to prepare a Housing Site Allocations Development Plan Document (DPD)
- Appendix C Regulation 18 consultation summary of representations
- Appendix D Email sent on 25 July 2014 to all Council Members advising of the Housing Site Allocations DPD preferred options consultation
- Appendix E Housing Site Allocations DPD preferred options consultation comments form
- Appendix F Email/letter sent on 25 July 2014 to all consultees on the Planning Policy database advising of the Housing Site Allocations DPD preferred options consultation
- Appendix G Letter sent on 25 July 2014 to properties within 100m of sites shortlisted as preferred options
- Appendix H Press release issued on 25 July 2014 advising of the Housing Site Allocations DPD preferred options consultation
- Appendix I Covering memo/letter accompanying the Housing Site Allocations DPD preferred options consultation document to libraries that was placed in libraries and in the Council offices
- Appendix J Letter with accompanying article sent to parish clerks on 3 July 2014 giving advance notice of the Housing Site Allocations DPD preferred options consultation
- Appendix K Poster sent to parish clerks advising of the Housing Site Allocations DPD preferred options consultation
- Appendix L Email to all Council members sent on 19 September 2014 advising of the consultation on the preferred option policies for housing in the countryside
- Appendix M Preferred option policies for housing in the countryside consultation comments form

- Appendix N Email/letter sent on 19 September 2014 to all consultees on the Planning Policy database advising of the consultation on the preferred option policies for housing in the countryside consultation comments form
- Appendix O Covering memo/letter accompanying the preferred option policies for housing in the countryside consultation document to libraries that was placed in libraries and in the Council offices
- Appendix P Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Chapter 1: Introduction.
- Appendix Q Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Chapter 2: Content [*includes comments on the settlement boundary reviews, sites for Gypsies, Travellers and Travelling Showpeople, policies to guide development in the countryside, parking standards for residential development*]
- Appendix R Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Housing Site Allocations - Newbury and Thatcham Spatial Area [*including Cold Ash*]
- Appendix S Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Housing Site Allocations - East Kennet Valley Spatial Area
- Appendix T Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Housing Site Allocations - North Wessex Downs AONB
- Appendix U Summary of key issues raised in the Housing Site Allocations DPD preferred options consultation and the Council responses – Housing Site Allocations - The Eastern Area
- Appendix V Local Plan newsletters (December 2013, April 2014 and December 2014)
- Appendix W Email/letter sent on 28 November 2014 to all consultees on the Planning Policy database to provide an update on the Housing Site Allocations DPD

SHLAA consultation with the parish and town councils

January-February 2014

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Introduction

The purpose of the consultation sessions was to informally discuss with the district's parishes and town councils the potential housing sites identified in the Strategic Housing Land Availability Assessment (SHLAA), preferences, local issues and community aspirations. Several ward members also attended the sessions.

The SHLAA is part of the evidence base for the preparation of the Local Plan. It identifies sites with housing potential and makes an assessment on developability. At this stage, the SHLAA only considers sites that are within or adjacent to the settlement boundaries.

The consultation sessions ran between January and February 2014, and following the events, draft notes of the sessions were sent to the Parish and Town Councils so that they could add any further comments. Information was also sought on recent flooding. These further comments are incorporated into the following notes.

**SHLAA Consultation Event – South Newbury
5 February 2014**

Present

Robert Beurtridge	Greenham Parish Council
John Boston	Greenham Parish Council
Tony Forward	Greenham Parish Council
Shirley Huxtable	Greenham Parish Council
Heather Westbrook	Greenham Parish Council
Graham Hunt	Newbury Town Council
Anthony Pick	Newbury Town Council
Roger Hunneman	Victoria Ward Member
Tony Vickers	Northcroft Ward Member
Liz Alexander	West Berkshire Council
Sarah Conlon	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

Western area 'catch all' session (6 February 2014):

Janet Haines	Enborne Parish Council (Interim Clerk)
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council

Site specific comments

NEW047A: Land adjoining New Road
NEW047B: Land north of Draytons View
NEW047C: Land to the east of Greenham Road
NEW047D: Land to the north of Haysoms Drive
NEW047H: Land adjoining Lamtarra Way

Newbury Town Council (NTC) would prefer if the whole of NEW047 could be retained as green space and would like to see all development within walking distance to green space. Greenham Parish Council (GPC) concurs with this view. It was felt that the cluster of sites forming NEW047 are ecologically sensitive and could have landscape impacts. Development in this area would be visually prominent.

The gap between Greenham and Newbury should be retained and it was felt there are better uses for the site than residential, for example NTC suggested allotments, community growing, recreational area. GPC would consider limited expansion to existing development but the vast majority of NEW047 should be retained as green space.

NEW047A is a designated wildlife site.

NEW47B and NEW047C are very popular with local dog-walkers and well used by the community. Such green spaces are very valuable resources as they take pressure off Greenham Common.

NEW047D is not vacant as described on the SHLAA and this should be amended – it is grassland.

It was explained by WBC that the sites forming NEW047 are divided into smaller sites as this is how the land was promoted to the Council. GPC would like NEW047 to be considered as a whole.

NEW054: The Vicarage, Greyberry Copse Road

Concern was raised about the impact on the listed church and Audrey meadows. NTC commented that the site is well used by local residents and the community, and would like the description within the SHLAA to be amended to read amenity land/car park. Development on this site would be visually prominent.

NEW053: Land to the north of Mill Hall School, Pigeons Farm Road

GPC would be supportive of development on this site. It is already close to other development and bus stops etc, so low density well designed housing on this site would mean another site could be spared. Although there are TPOs on the site, this was not seen as a constraint.

NEW056: Greenarces Gym, Greenham Road

It was agreed that this is a very important facility within the community. The planning requirements to replace the facility elsewhere and the same standard should be upheld and enforced. It was felt that the new facility should be built and in use before the old facility is demolished.

Given the facility is privately owned it could close at anytime and the ability to seek a replacement through planning would not be possible.

Greenacres aside, if the site was a field there was general agreement that development should take place on previously developed land before greenfield land, but if the site was already previously developed then it is in a very sustainable location and development could be considered appropriate.

NEW057: Land adjoining Pinchington Lodge

NTC commented that this site forms part of Sandleford Farm which has gradually been eroded. GPC commented that apart from heritage and landscape issues this is a good place to live – but a balance is required.

WBC explained that more heritage work would need to be carried out on certain sites before such sites could be allocated.

NEW058: Land to the east of Sandleford Lodge Mobile Home Park

GPC were concerned that much of the area has already be degraded through development and therefore a precedent has been set.

NEW059: Land to the south of Deadmans Lane

GPC raised concern regarding noise impact from the road and amenity site, they stressed the need to consider the cumulative impact. Development would increase the traffic problems in the area.

If an access was provided off the A339 into the Sandleford Park site this could reduce the noise impact.

Both GPC and NTC agreed that this site could provide a pedestrian and cycling access to Greenham Common.

Concern was raised over the visual impact on the historic park and garden.

NEW038: Land at Abbottswood, Newtown Road

This site has been allowed to degrade. NTC agree with the assessment set out within the SHLAA.

NEW008: Land adjoining Mencap Respite Centre, Pinchington Lane

Both GPC and NTC agreed that this site would be a good location for development.

NEW012: Land to the north of Newbury College

This site, whilst in some ways is an ideal location for development, is seen as a green gateway into Newbury. NTC would like to see this site used as allotments or for community growing.

Concern was raised over the cumulative impact of development on the road network and infrastructure providers. WBC explained that additional accesses for Sandleford Park were being pursued as a result of consultation and to increase the permeability of the site. The Council have ongoing discussions with infrastructure providers regarding, not just the Sandleford site, but the total housing requirement for the District.

NEW019: Land at Sandpit Hill / Andover Road

GPC suggested this site could provide strategic access to the Andover Road from the Sandleford Park site. This would also require the use of site NEW108.

NTC have concerns regarding the gradient and drainage of this site. The distance to the town centre could be an issue and development on this site could impact on views from the southern part of Sandleford Park.

NEW103: Sanfoin, Safoin Cottage, Garden Close Lane

NEW104: Land at Warren Road

There were mixed views about NEW104, on the one hand it has the potential for 10 large houses as an extension to Sandleford Park, but on the other it should be left as green space. Access to NEW103 raised some concern and there was general agreement that the site should be left as green space.

NEW108: Land at Wildwoods, Kendrick Road

GPC would like this site to remain as green space. Access to the site is an issue. The site could be used to form part of an access to Sandleford Park along with NEW019.

NTC would like this site to be considered for a wind turbine. It is the second windiest site in Newbury and could provide energy for Sandleford Park.

NEW091 and NEW092: Land at Wash Water (The Chase Phases 1 & 2)

NTC queried whether NEW091 and NEW092 (The Chase) were owned by the National Trust. It was explained by WBC that the site NTC were referring to was in Hampshire. Whilst NEW091 and NEW092 are collectively known as 'The Chase' there are very different circumstances surrounding them.

GPC considered these sites more sustainable than others discussed within the SHLAA.

NEW097: Land adjacent to Hill View, Wash Water

NTC agree with the assessment within the SHLAA for this site.

NEW090: Plot 2, Bell Hill

The site is located within the Newbury Battlefield and is not currently developable.

All sites on the western edge of Newbury are constrained by their location within the Newbury Battlefield.

NEW017: Land to the north and south of Enborne Road

NEW018: Land at Bonemill Lane

GPC expressed concern about the noise from the railway and issues regarding access to these sites. A road linking to the A34 would be required in order to ensure the sites were accessible.

NTC expressed a desire for NEW018 to be an extension to the existing allotments.

NEW011: Land adjacent to Oxford Road

Recently impacted by flood water.

Sites within the settlement boundary:

NEW021: Land to rear of Russell Road

Recently impacted by flood water.

NEW024: Land at St Johns Garage, Newtown Road

General agreement that this site should be developed - it is previously developed land and within settlement.

NEW082 Sterling Industrial Estate, Kings Road

General agreement that this site should be developed – it was considered that the link road is vital for the delivery of this site.

NEW087: Hutton Close

Impacted recently by flood water

General comments:

Any sites within the SHLAA should be considered in the context that Sandleford Park will be developed. Whilst the Council can not make development take place, discussions regarding the site are ongoing with the Sandleford Partnership.

GPC commented that it is important to progress sites to allocation to ensure a strong 5 year land supply and prevent development coming forward in a piecemeal manner.

NTC queried whether Sandleford Park could deliver more than 1000 homes in this plan period (up to 2026) which could then result in fewer allocations. WBC explained that the estimated rate of delivery from the site is 100 dwellings per year, and that development can only occur at the rate at which the houses can be marketed.

GPC commented that a balance needs to be sought between housing and employment – discussion focused around housing delivery but this needs to be considered in the context of jobs and employment. The evidence for employment land needs to be updated.

NTC raised concern about mixed use development schemes (business and residential).

There was a general desire for policy ECON6 to be updated, along with the development brief for New Greenham Park. It was explained by WBC that the role and function of the District's employment areas will be assessed at the next stage of the SAD DPD. This work will be based on updated evidence and site surveys.

GPC commented that the mix of houses was very important as some people within the parish may wish to downsize and remain within the area, so a mix is required everywhere.

GPC queried the use of CIL and it was explained by WBC that CIL has not been adopted or implemented yet, and therefore S106 still applies to development.

NTC raised concern that some Inspectors are making decisions against policy and that some Parish Councils are starting to campaign against PINS.

NTC would like to see more public consultation on the Market Street redevelopment.

NTC commented on the need to plan holistically for infrastructure which will be required to support development. Development will change the character of the Newbury and the District as a whole.

NTC stressed that we need to be thinking and planning for the longer term and highlighted the issues that could be facing Newbury in 60 years time – higher education, sports complex, concert hall, traffic issues etc. Also thought we should be considering sharing more services with Thatcham and that we need to think about how the individual communities interact.

**SHLAA Consultation Event – North Newbury
5 February 2014**

Present

Jeff Beck	Clay Hill Ward Member
Jim White	Cold Ash Community Partnership
Geoff Findlay	Cold Ash Parish Council
Mike Monroe	Cold Ash Parish Council
Linda Verner	Cold Ash Parish Council
Garth Simpson	Cold Ash Ward Member
Graham Hunt	Newbury Town Council
Anthony Pick	Newbury Town Council
Tony Vickers	Northcroft Ward Member
Bill Ashton	Shaw-cum-Donnington Parish Council
Lisa Harrop	Shaw-cum-Donnington Parish Council
Ted Hooker	Shaw-cum-Donnington Parish Council
Andy Nichol	Shaw-cum-Donnington Parish Council
Paul Bryant	Speen Ward Member
Roger Hunneman	Victoria Ward Member
Liz Alexander	West Berkshire Council
Paula Amorelli	West Berkshire Council
Laila Bassett	West Berkshire Council
Sarah Conlon	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

Prior to the discussion of individual sites, the Town and Parish Councils summarised the approach they thought should be taken to potential future housing sites.

Newbury Town Council (NTC) – would prefer development on previously developed land and on greenfield only as a last resort. They disliked mixed industrial and residential development and thought that housing should be built within walking distance of green spaces and parks.

Sufficient capacity from industrial and commercial use must be maintained to avoid becoming a dormitory town.

Shaw-cum-Donnington (ScDPC) – sites should not encroach onto agricultural land. They had infrastructure concerns, particularly roads into Newbury.

Cold Ash (CAPC) – Concerned about the impact that development in other places would have on the Parish and AONB. Also concerned about flooding.

WBC noted that the Core Strategy is clear that there has to be some development on greenfield land.

Site specific comments

NEW045: Coley Farm, Stoney Lane, Ashmore Green

NEW096: Land off Stoney Lane, Stone Copse, Cold Ash

NEW105: Land at Yates Copse

The area is already densely populated and there was general agreement concerning the implications for existing infrastructure, particularly surgeries and highways.

Stoney Lane would need to be widened which CAPC would strongly oppose. Traffic on Turnpike Road would also be an issue. Flooding issues were also highlighted. There was a general concern about the potential loss of visual amenity as the area is one of the gateways into Ashmore Green. There was an appeal on the site about five years ago and the Inspector determined a height over which development shouldn't go due to landscape implications. The area is very steep in places – classic drift geology. Felt the area was an important recreational resource for birdwatchers, walkers, and horseriders.

NTC felt that the area is already densely populated, and significant infrastructure problems would include schools as well as surgeries and highways.

CAPC commented that these sites are extremely undesirable for the following reasons:

Environment:

- Loss of visual gateway to Ashmore Green and Cold Ash.
- The landscape is of a high character and represents a front-line buffer zone to the AONB.
- Yates Copse and Stone Copse are Ancient Woodlands/Wildlife Heritage Sites.
- An urban scene would cause the loss of 18th century hedgerows and canopies in Stoney Lane, an attractive amenity valued by walkers, horse riders and bird watchers.

Traffic/Access:

- Stoney Lane would need to be widened.
- Traffic in Kiln Road/Turnpike is high at c.30k movements/week with frequent tail-backs.
- The hypothetical housing numbers [45, 75, N/A] would generate an additional c. 4-6k movements/week.
- The shops in Shaw are limited.

Flood Risk:

- History of flooding in Manor Park, Waller Drive, Turnpike Industrial Estate and Cresswell Close(2007).
- A complex area of drift geology, with mixed sands, clays and gravels.
- Would require a major investment in flood retention ponds, and berms, along with an effective SuDs implementation.

NEW063: Pear Tree Lane

General agreement with WBC assessment. Concerns over access as currently shown to be from an unmade road. Impact on traffic and flooding, Tree Preservation Orders (TPOs) and wildlife concerns.

CAPC commented that the site is extremely unattractive for the following reasons:

Environment:

- Partial loss of visual gateway to Ashmore Green and Cold Ash
- Entails the partial loss of the southern part of Messengers Wood, an Ancient Woodland and Wildlife Heritage site with many TPOs.
- An historic site assessment is needed.

Traffic/Access:

- Access (via Pear Tree Lane) to Kiln Road/Turnpike and to Long lane is needed for access to shops, school and work.
- Traffic in Turnpike/Kiln Road (c.30k movements/week) and Shaw Hill (c. 50k movements/week) are high.

Flood Risk:

- Complex area of drift geology, with sands, silts and gravels.
- Flood history in the area from water run-off from Messengers Wood (2007 and 2014).
- Would require an investment in flood retention ponds and berms, together with an effective implementation of system of SuDs.

NEW001: Land at Long Lane

NEW010: Land at Long Lane, Shaw

There was general agreement that these should be considered as one site.

The main issues were the consideration of the 2nd Battle of Newbury, the increase in traffic along B4009 and Love Lane, flooding, the impact on schools (currently full) and the impact on the character of Shaw-cum-Donnington. In addition, NEW001 is adjacent to Shaw Cemetery which has about 25 years worth of space left and the site could potentially be used as an expansion to that.

Flooding takes place from the site onto Shaw Cemetery and Cromwell Road. SUDs would be required. Site has recently experienced flooding.

Local schools are already full.

ScD have submitted the following pictures of recent flooding on the site, and these can be seen in Figures 1, 2 and 3 of Appendix 1.

CAPC commented that these sites are extremely undesirable for the following reasons:

Environment:

- The creation of an urban sprawl impacts an essentially rural scene.
- An historic site assessment is required.
- Loss of grade 2 agricultural land.
- Tree borders would need to be maintained.

Traffic/Access:

- Access to schools and shops would require additional footpaths/pavements in Long Lane and Shaw Hill.
- The junction of Shaw Hill/Kiln Road/Shaw Road is already complex for vehicles, pedestrians and cyclists.
- Hypothetical housing numbers [142, 55] would generate an additional 5-8k movements/week. Shaw Hill already takes 50k movements/week.

Flood Risk

- History of flooding both for surface water run-off and ground water swelling (2007 & 2014).
- Complex area of drift geology, with sands, gravels and clays over a chalk bedrock.
- Would require a major investment in flood retention ponds and berms, plus an effective SuDs implementation scheme.

NEW032: The Bungalow, Shaw Farm Road

There was general agreement that the principle of development on the site was acceptable. It was a relatively small brownfield site. There were concerns about access however.

NEW031A and B: Land at Shaw, west and east of A339

ScDPC concerned that a development of this size would double the size of ScD and destroy the character of the village. There was general agreement that this site should be considered at a more strategic level post 2026 as there would be significant infrastructure requirements which should be an integral part of the development. Phased development as currently proposed would not achieve this. Flooding, impact on traffic, access, pressure on schools also of particular concern.

Concern related to the sole means of access being from the Vodafone Roundabout. Suggestion made that access to the eastern site could be via the roundabout now on Vodafone property.

The site has been recently impacted by floodwater, as can be seen in figures 6, 7 and 8 of Appendix 1.

NEW051: Foxglove House, Love Lane, Donnington

ScDPC noted that the principle of development wasn't of concern but implementation could be an issue – particularly access (NTC noted that Love Lane cannot manage additional traffic). Would want to keep car park and allotments, otherwise the site could be contentious. Car park is used extensively for the Hall and the Parish Plan made clear that the allotments should be preserved.

NEW064: Upper Donnington

There was general agreement with the WBC assessment

NEW011: Land adjacent to Oxford Road

There was general concern that this was a water meadow and so should be retained. NTC had previously considered the northern part of this site for allotments.

Site has been impacted by flood water recently as can be seen in Figure 8 below.

NEW042: Land at Bath Road, Speen

It was agreed that the principle of development on this site may be acceptable. It was noted that the local residents were very opposed to this site and it was agreed that the allotments were the main issue. It was also relevant to the 2nd Battle of Newbury.

It was felt that traffic implications wouldn't be as extensive as other sites. But there were concerns that access would be an issue.

NEW040: Land south of Kimbers Drive, Speen

NTC thought this was inappropriate for development as it is a high quality green space. The steepness of this site was of general concern.

NEW106: Land at Moor Lane Depot, Hill Road

NTC were concerned about access issues. Hill Lane is the only way in.

Sites within the settlement boundary

NEW025: Land adjoining Faraday Road and Fleming Road

NTC suspect that there was recently standing water very close to the site.

NEW046: Quantel Ltd, Turnpike Road

NTC agreed this site had potential for redevelopment

NEW073: British Telecom, Bear Lane

NTC would be happy to see the BT building replaced, and have no objection in principle to the redevelopment of the site. However, given its central position, high-quality mixed-use development appropriate to its location in the town would be essential. An alternative site for the postal sorting office would need to be found.

CAPC, whilst also happy to see the BT building replaced and have no objection in principle to redevelopment of the site, commented that given its central position, an architecturally high-quality mixed-use development appropriate to its location in the town is essential. An alternative site for postal sorting will have to be found.

NEW087: Hutton Close

NTC thought that only the southern part of this site had potential for redevelopment, although concern raised over traffic impact as Shaw Road is already congested at peak hours.

The site has recently suffered flooding, as can be seen in Figure 9 of Appendix 1.

NEW075: Waterside Youth Centre

NTC considered this was inappropriate for development. NTC feel that it is an essential youth and community centre and should be kept this way. It would be wasted as a residential space.

NEW107: Units 1-22 River Park Industrial State, Ampere Road

NTC thought this should be retained as an industrial area. They suspect that there was recently standing water very close to the site.

NEW109: Newbury Business Park

NTC considered this was inappropriate for development; it should be retained for business use. They suspect that there was recently standing water very close to the site.

NEW110: London Road Industrial Estate

NTC suspect that there was recently standing water very close to the site.

General comments

NTC stressed that we need to be thinking and planning for the longer term and highlighted the issues that could be facing Newbury in 60 years time – higher education, sports complex, concert hall, traffic issues etc. Also thought we should be considering sharing more services with Thatcham and that we need to think about how the individual communities interact.

NTC also commented that we must keep sufficient capacity for industrial and commercial use, to avoid becoming a dormitory town.

**SHLAA Consultation Event – Cold Ash (and Thatcham)
5 February 2014**

Present

Geoff Findlay	Cold Ash Parish Council
Mike Monroe	Cold Ash Parish Council
Linda Verner	Cold Ash Parish Council
Jim White	Cold Ash Community Partnership
Garth Simpson	Cold Ash Ward Member
Liz Alexander	West Berkshire Council
Paula Amorelli	West Berkshire Council
Laila Bassett	West Berkshire Council

Apologies:

Cllr Hilary Cole (Exec Portfolio – Planning)

The workshop session started with a joint discussion with members of Thatcham Town Council about the Cold Ash sites that are located immediately north of Thatcham: THA010, THA011, THA014, THA016 and THA027.

CAPC submitted during the session some written comments on factors that affect Cold Ash. These are covered off in the general comments section below, however the written comments are included in full at Appendix 2.

The comments made by CAPC relating to sites THA011, THA014, THA019 and THA027 apply equally to those sites when listed in document “SHLAA Consultation Event – Thatcham (and Cold Ash) 5 February 2014”

THA010 (Hillview Farm, Ashmore Green Road) and THA016 (Land to the North of Ashmore Green Road):

Cold Ash Parish Council (CAPC) and Thatcham Town Council are in agreement with West Berkshire Council (WBC) that both sites are not currently developable.

It was highlighted that the sites are on high gradients. Development at these locations would destroy the Ashmore Green area.

THA011 (land to the north of Bowling Green Road), THA014 (land at Regency Park Hotel) and THA027 (The Creek, Heath Lane):

Traffic a concern – the roads are heavily used at present and the existing road network is struggling to cope. Extra traffic as a result of development will exacerbate this. Bowling Green Road would be affected.

West Thatcham flooded in 2007. North Thatcham residents are concerned at water runoff causing flooding, especially at Bowling Green Road. If flood prevention techniques are used, still have to find somewhere to put water. WBC is putting in new balancing ponds, but concern by parishes that the amount of development may be too much for the ponds (WBC construction of remaining eight retention ponds in the Thatcham SWMP is dependent on Defra and EA funding; this is not guaranteed and the second pond has received no funding). SuDs are designed to offset new buildings only and no allowance for the alleviation of existing flooding is made. There

is a statutory requirement to provide SuDs in new developments; no national SuDs standards exist and enforcement of SuDs implementation is not guaranteed if a development project becomes uneconomic due to the cost of SuDs provision after planning consent has been given.

Visually, development would detract from the rural approach to Cold Ash. Thatcham Vision's consultation on the Thatcham Plan has revealed that gaps between settlements are an emotive issue, and there is strong support for gaps remaining and not being diminished.

All three sites are traditional agricultural land with ancient woodlands and pre-enclosure hedgerows.

If the three sites are considered separately, flooding will still be an issue and there will still be an adverse impact on traffic flows. Both Parish Council's are concerned that precedents would be set should the sites be developed. The sites are some distance from services and public transport.

Overall, CAPC feel that sites THA011, THA014 and THA027, when viewed collectively, are extremely undesirable for the following reasons:-

Environment

- would cause a dramatic reduction in the visual and physical separation of N Thatcham and Cold Ash village, with the loss of a rural gateway to Cold Ash
- eliminate the rural views from Bowling Green Road, Heath Lane and lower Cold Ash Hill, much valued by the residents
- highly visually intrusive from many vantage points looking south from Cold Ash village
- destruction of a pre-18thC field, and associated hedgerows
- abuts ancient woodland, putting habitat at risk
- destroys area of tranquillity and agricultural land between N Thatcham and Cold Ash

Traffic

- heavy impact on peak traffic flows along Heath Lane and Cold Ash Hill; also impacts A4 access from Tull Way and Floral Way
- significant access issues to Heath Lane and Bowling Green Road
- remote from very limited public transport and commercial and social facilities, driving heavy car dependency

Flooding

- site required to locate 2/3 additional, unfunded, flood retention basins to complete flood protection for significant area of N Thatcham
- sewerage system of Northfield Road incapable of taking up extra load from a large development
- no legitimate enforcement capability for SuDs system required for such a development
- land has flooded previously and contributed to flooding (see Thatcham SWMP); sequential test of flood risk should eliminate this site versus others in district

THA019: Land at Little Copse

Little Copse is ancient woodland and development would surround this. It is possible that there are dormice and newts on the site.

Question of access – an access point on Cold Ash Hill would impact on traffic flow. CAPC noted that peak flows on Cold Ash Hill are 500 vehicles an hour and roads in the area are narrow old farm tracks.

The site offers good visual amenity to areas south of the site.

Development here would affect the gateway to Thatcham.

The site offers good visual amenity to areas south of the site.

Development here would affect the gateway to Thatcham.

Overall this site is extremely undesirable for the following reasons:-

Environment

- visually very intrusive when viewed from a number of locations looking south from Cold Ash
- creation of an urban sprawl in an explicitly rural scene
- would destroy the character and visual amenity of Cold Ash
- would effectively surround the Little Copse ancient woodland and damage the wildlife habitat
- would create substantial additional noise and disturb the tranquillity of Southend
- destruction of one of the few remaining pre 18thC fields in the Parish

Traffic

- no realistic access to the site, the alternatives being: another access on to Cold Ash Hill (which carries >35k traffic movements per week); through the Southend estate; on to Laurence's Lane, a single lane farm track
- the increased traffic will generate an additional 1,000 movements per week, adding to peak time overload
- remote from very limited public transport, and all commercial and social services which will drive car usage

Flood Risk

- increased surface water runoff from the site which is significantly above the new retention pond, increasing the load on this facility which only partially protects N Thatcham
- sewerage system in N Thatcham inadequate to accept further load

COL002: Land at Poplar Farm

There are limits to development of this site because of a listed building and the site being in a line of flooding.

This site lies directly in the path of surface water run off from further up the escarpment (See flooding in the past few weeks on Poplar farm). Any building would be situated on a drift geological formation that exacerbates flooding further downhill. There is an existing Grade 2 listed building on the site. The site forms a significant part of the open views from the village over the surrounding open slopes and farmland.

COL004: Liss, Cold Ash Hill

Limited potential, but there could be a small amount of development on the site. CAPC considered this to be the least worst site.

Site sits ahead of surface water that runs down.

This site lies at the head of a gully (drift – silt/sand/gravel – geological formation), any building would add significantly to downhill flooding. The slopes and nature of the land would much reduce the amount of housing that this site could support. The site is outside the existing settlement boundary, traffic from the site would add to the already dangerous situation outside St Marks Infants and Junior school.

COL006: St. Gabriel's Farm

The site is on a ridge and there are good views southwards.

A gully runs along the base of the site so development would have implications on flooding and run-off.

There are no footpaths and the road is narrow. Unsustainable site.

This site sits on an exposed ridge and is a significant view and important open slope. Development of the site would close a significant gap between existing housing, worsening the ribbon development to the detriment of the character of the village. Lower down the slope, immediately below the site, is a gully made up of a Sand/Gravel- Drift geology, which will add to the downhill flooding. There are no footpaths that allow for walkers to get to public transport or local schools and shop, which would mean additional vehicular traffic.

Overall, CAPC feel that sites COL002/004/006/010 are unsuitable for the following reasons:

Environment

The main village of Cold Ash is situated on a ridge and lays immediately adjacent to the North Wessex Downs AONB. Building on these sites would contravene NPPF guidelines that states that highly visible areas such as exposed ridges, landforms and open slopes should normally be protected. Areas of sporadic, dispersed or ribbon development should normally be excluded from development, this combined with the Parish being on the fringe of the AONB means that any open spaces should be safeguarded from development. The wider setting and important views should be taken into account when proposing development.

Traffic/Access

Traffic is already a problem within and through the Parish. Hermitage Road, The Ridge, Ashmore Green Road, Stoney and Lane Fishers Lane are old farm tracks with poorly constructed paving to carry the now substantial volume of traffic using these roads as rat runs to the M4 and A34 and Newbury. Additional traffic volume would overwhelm the Parish and cause substantial deterioration in the quality of life for the Parishioners.

Flood Risk

Cold Ash Parish is built mainly on a ridge, an escarpment, the geology of which (complex area of drift geology, with sands, gravels and clays over a chalk and clay bedrock) means that there is a history of flooding downhill from the main village, both from surface water run-off and ground water (2007 & 2014) flowing downhill from the

Parish to the towns and villages in the Kennet Valley. Current flood retention ponds being built at the bottom of Cold Ash Hill, on the northern border of Thatcham, are specified *for the existing run-off volumes*. Any additional building in above these ponds will only add to the problem.

COL007: Land at St. Gabriel's Convent

Convent still in use. CAPC of the view that the sheltered accommodation would be suitable at the convent. CAPC of the view that the sheltered accommodation would be suitable at the convent.

The land adjacent to the site is lies in a natural valley and is very steep.

COL009: Baggars Folly, The Ridge

Parish Council in agreement with WBC that the site is not currently developable. They added that the steep slope of the site would be very difficult to build on. The site is also poorly related to the settlement. Within the AONB.

COL010: Land at Westrop, The Ridge

Unsuitable. There are exceptionable views from the site, which lies within the AONB.

NEW001: Land at Long Lane

This land should be protected should the cemetery need to expand in the future.

General Comments

Flooding:

Geology of Cold Ash influences flooding. Cold Ash lies atop a steep scarp slope that runs from east to west along a ridge. The east-west ridge controls the flow of drainage southwards towards the flood plains of the Kennet Valley.

Future developments must not compromise the flood prevention solution works at Little Copse and north of Henwick Creek and Tull Way, which remain unfunded.

The adverse effects of further flooding should be mitigated by controlling the flash flow of heavy rain, and avoidance of development on known water courses, water storage and drainage areas.

Traffic:

Increase in traffic over the last 15 years as a result of development, reduction in bus services and an increase in numbers at the two primary schools (the two schools are both voluntary aided and so serve a large catchment. Parents tend to drive to and from the schools).

Increase in commuter traffic through Cold Ash to the A4 and M4. The extended chicanes through the village create hold ups at peak times. When there are accidents on the A4 and M4, drivers tend to divert through Cold Ash.

Traffic volumes are high on Long Lane and Shaw Hill Road.

Development in the village should not lead to further traffic increases.

CAPC have submitted details of the average weekly rate of traffic in Cold Ash. This is included in Appendix 2.

Other:

Rural character of Cold Ash should be retained.

CAPC would like to see the AONB boundary changed so that all of Cold Ash is included. They consider Cold Ash to be an area of high landscape value. WBC advised that landscape assessments would be undertaken on the SHLAA sites.

CAPC queried what the housing requirement is for Cold Ash. WBC clarified that there is no set housing requirement per settlement, and the amount of development depends on factors such as facilities and services, as well as the availability of suitable development opportunities.

As a service village, Cold Ash is deprived of facilities so there is an increased dependency on Newbury and Thatcham. New recreational facilities are required as existing ones are well used and book up quickly. There is also a lack of public transport facilities.

Concern that Thatcham Garden Centre in the SHLAA (ref. THA023) as development here could add more traffic in Ashmore Green and Cold Ash.

Broadband speeds an issue in Cold Ash.

**SHLAA Consultation Event – Thatcham (and Cold Ash)
5 February 2014**

Present:

Mel Alexander	Thatcham Town Council
Lynne Pettyfer	Thatcham Town Council
Mireille Willan	Thatcham Town Council
Roger Croft	Ward Member for Thatcham
Keith Woodhams	Ward Member for Thatcham
Liz Alexander	West Berkshire Council
Alistair Buckley	West Berkshire Council
Sarah Conlon	West Berkshire Council
Rachael Lancaster	West Berkshire Council

Apologies:

Sheila Ellison (Ward Member for Thatcham)

Site specific comments

The workshop session started with a joint discussion with members of Cold Ash Parish Council about sites THA010, THA011, THA014, THA016, THA019, THA027 that fall within the Cold Ash parish boundary but are immediately north of the Thatcham Town Council boundary.

THA010: Hillview Farm, Ashmore Green Road) / THA016: Land to the north of Ashmore Green Road)

These sites are not seen as developable by Cold Ash Parish Council (CAPC). Surface and groundwater flooding are issues here. The ground is currently saturated. Run off from the hills to the north of Thatcham lead to flooding in 2007 and can lead to pooling of water along roads in the northern part of Thatcham. While some flood alleviation works, in terms of balancing ponds, are currently going on, these are for the existing problem not future issues.

Sewerage systems would need to be upgraded.

Traffic along Heath Lane and surrounding roads is bad and much of the road network cannot take more traffic. Public Transport in this area of Thatcham is not great.

Visually development of these sites would detract from the entrance into/out of Thatcham.

Thatcham Vision refresh residents consultation indicates residents would like to keep the gap between settlements.

There is a fear amongst local residents that should 1 site go for housing it will set a precedent for further development in the future further outside Thatcham.

THA011: Land to the north of Bowling Green Road) / THA014: Land at Regency Park Hotel) / THA027: The Creek, Heath Lane

It was considered that the flooding issues and traffic problems, especially at peak times, are so significant that development of these sites would be unacceptable.

Development of these sites would visually detract from the entrance to Cold Ash and reduce the gap between Cold Ash and Thatcham. Both Parish Councils would not like to see the identity of the two settlements lost.

The sites are considered to be remote from services and facilities, such as bus stops and the Town Centre.

CAPC made the following comments:

Traffic a concern – the roads are heavily used at present and the existing road network is struggling to cope. Extra traffic as a result of development will exacerbate this. Bowling Green Road would be affected.

West Thatcham flooded in 2007. North Thatcham residents are concerned at water runoff causing flooding, especially at Bowling Green Road. If flood prevention techniques are used, still have to find somewhere to put water. WBC is putting in new balancing ponds, but concern by parishes that the amount of development may be too much for the ponds (WBC construction of remaining eight retention ponds in the Thatcham SWMP is dependent on Defra and EA funding; this is not guaranteed and the second pond has received no funding). SuDs are designed to offset new buildings only and no allowance for the alleviation of existing flooding is made. There is a statutory requirement to provide SuDs in new developments; no national SuDs standards exist and enforcement of SuDs implementation is not guaranteed if a development project becomes uneconomic due to the cost of SuDs provision after planning consent has been given..

Visually, development would detract from the rural approach to Cold Ash. Thatcham Vision's consultation on the Thatcham Plan has revealed that gaps between settlements are an emotive issue, and there is strong support for gaps remaining and not being diminished.

All three sites are traditional agricultural land with ancient woodlands and pre-enclosure hedgerows.

If the three sites are considered separately, flooding will still be an issue and there will still be an adverse impact on traffic flows. Both Parish Councils are concerned that precedents would be set should the sites be developed. The sites are some distance from services and public transport.

Overall THA011, THS014 and THA027, viewed collectively, are extremely undesirable for the following reasons:-

Environment

- would cause a dramatic reduction in the visual and physical separation of N Thatcham and Cold Ash village, with the loss of a rural gateway to Cold Ash
- eliminate the rural views from Bowling Green Road, Heath Lane and lower Cold Ash Hill, much valued by the residents
- highly visually intrusive from many vantage points looking south from Cold Ash village
- destruction of a pre-18thC field, and associated hedgerows
- abuts ancient woodland, putting habitat at risk

- destroys area of tranquillity and agricultural land between N Thatcham and Cold Ash

Traffic

- heavy impact on peak traffic flows along Heath Lane and Cold Ash Hill; also impacts A4 access from Tull Way and Floral Way
- significant access issues to Heath Lane and Bowling Green Road
- remote from very limited public transport and commercial and social facilities, driving heavy car dependency

Flooding

- site required to locate 2/3 additional, unfunded, flood retention basins to complete flood protection for significant area of N Thatcham
- sewerage system of Northfield Road incapable of taking up extra load from a large development
- no legitimate enforcement capability for SuDs system required for such a development
- land has flooded previously and contributed to flooding (see Thatcham SWMP); sequential test of flood risk should eliminate this site versus others in district

THA019: Land at Little Copse

Part of this site is being used for the flood attenuation scheme.

Little Copse, is an ancient woodland, already with development on one side. Any further development would have a negative impact on the woodland and the wildlife associated with it.

Access to the site would not be easy and the local roads are not really suitable for more traffic, especially near to the school (St Mark's Cold Ash).

Development of the site would lead to the sprawl of development going up Lawrences Lane. This would destroy the character and visual amenity of Cold Ash.

Concern traffic from here would use Cold Ash as a 'rat-run' to reach the M4.

CAPC made the following comments:

Little Copse is ancient woodland and development would surround this. It is possible that there are dormice and newts on the site.

Question of access – an access point on Cold Ash Hill would impact on traffic flow. CAPC noted that peak flows on Cold Ash Hill are 500 vehicles an hour and roads in the area are narrow old farm tracks.

The site offers good visual amenity to areas south of the site.

Development here would affect the gateway to Thatcham.

Overall this site is extremely undesirable for the following reasons:-

Environment

- visually very intrusive when viewed from a number of locations looking south from Cold Ash
- creation of an urban sprawl in an explicitly rural scene
- would destroy the character and visual amenity of Cold Ash
- would effectively surround the Little Copse ancient woodland and damage the wildlife habitat
- would create substantial additional noise and disturb the tranquillity of Southend
- destruction of one of the few remaining pre 18thC fields in the Parish

Traffic

- no realistic access to the site, the alternatives being: another access on to Cold Ash Hill (which carries >35k traffic movements per week); through the Southend estate; on to Laurence's Lane, a single lane farm track
- the increased traffic will generate an additional 1,000 movements per week, adding to peak time overload
- remote from very limited public transport, and all commercial and social services which will drive car usage

Flood Risk

- increased surface water runoff from the site which is significantly above the new retention pond, increasing the load on this facility which only partially protects N Thatcham
- sewerage system in N Thatcham inadequate to accept further load

THA008: Land at Siege Cross Farm and Colthrop Manor) / THA007: Land at Harts Hill) / THA028: Land north of Floral Way and east of Harts Hill Road

Development here would contribute to flood risk in Thatcham. The impact of development here would have an impact on the road network in north Thatcham and Cold Ash, especially at peak times, as there are limited alternatives (infrequent bus service).

A gully runs through THA008 which would increase the flood risk.

There are capacity issues at Kennet School, more so than at the primary schools.

THA028 is considered more acceptable than THA007 or THA008.

THA023: Thatcham Garden Centre) / THA009: Land at Tull Way (potential sites for leisure / education)

Planning history of the site is against development. Development could lead to traffic issues on Tull Way.

Some people felt that these sites would not be too bad, while others did not agree.

THA009: Land at Tull Way

Town Vision queried whether this site could be used for an extension of Henwick Playing fields. The view to the countryside are considered very important to the local residents.

THA023: Thatcham Garden Centre

There is a 100 year lease on part of the site, which could affect deliverability.

THA035: Kingsland Centre

The site has planning permission, but nothing has happened.

THA028: Land north of Floral Way and east of Harts Hill Road (a site to be considered further)

Similar comments to THA008.

Residents don't think that development should go here as it could set a precedent for future development on the other side of Floral Way.

A general feeling that this site could be more acceptable as there is already development on the other side of Harts Hill Road.

THA033: 99 Station Road

A good example of infill development.

THA013: 20-26 Chapel Street

A few applications have been in for this site. Only suitable for a small number of homes.

THA029: Former depot at Pound Lane

Land to be sold by WBC. Would be a good site for development

THA034: 1-8 Clerewater Place, Lower Way

The site is currently offices. This could be redeveloped under permitted development rights.

THA025: Land at Lower Way (a site to be considered further)

This site is within the Thatcham Moors Nature Reserve. The site does seem like logical place for development.

THA006: Lower Way Farm

Site is located adjacent to the sewage treatment works and floods. Potentially a site for allotments.

THA004: Rainsford Farm, Crookham Hill

Flooding is a major issue. Marina idea is one of interest. Development here could not take place unless improvements were made to the Thatcham Level crossing.

Potential to open up another crossing of the Kennet through the site. May not be practical now, but should be considered for longer term.

General comments

A large volume of traffic goes from North Thatcham to Basingstoke crossing the Thatcham level crossing. Improvements to this route are required.

Residents don't want development on hillsides.

Open space behind Francis Baily Primary School is included in the preferred option of flood attenuation measures in the Thatcham Surface Water Management Plan (Francis Baily detention basin).

Colthrop – Parish Council asked if there was any reason development could not go here. The vision consultation asked residents if unused industrial land should be used for housing. 70% of respondents said yes.

The Council were provided with a copy of the Thatcham Vision Community Survey results, which summarised below.

After the session, Thatcham Town Council submitted a report that considers the issues that have arisen as a result of the 2007 floods in Thatcham and what measures have been taken. They have additionally submitted 2007 flood survey maps of Thatcham and Cold Ash.

Thatcham Vision

Consultation on the Thatcham Vision with local residents has highlighted several points, which are identified below:

- Residents are opposed to development in green spaces between parishes.
- Would like lots of small developments, rather than a few large ones
- Preference for development to be carried out on unused industrial land before Greenfield
- A need for starter homes, affordable housing and low cost family homes
- The need for additional playing field / sports facilities
- A new secondary school and potentially a new primary school
- Residents are opposed to development on hillsides that will destroy the rural outlook of the town.

**SHLAA Consultation Event - Holybrook, Tidmarsh with Sulham & Theale
10 February 2014**

Present

Brian Bedwell	Calcot Ward Member
Hilary Cole	Executive Portfolio Holder – Planning
Mary Bedwell	Holybrook Parish Council
Clive Littlewood	Holybrook Parish Council
Charles Bateman	Theale Parish Council
David Wood	Theale Parish Council
Nick Flint	Theale Parish Council
Jo Friend	Theale Parish Council
Alan Macro	Theale Ward Member
Paula Amorelli	West Berkshire Council
Alistair Buckley	West Berkshire Council
Sarah Conlon	West Berkshire Council
Caroline Peddie	West Berkshire Council

General comments

Prior to the discussion of individual sites the Parish Councils made some general comments which they thought should be taken into account when considering any more development in this area as a whole. Theale Parish Council also submitted further written comments at the session which note the following:

Item 9 SHLAA Strategic Housing Land Availability Assessment

Some of the assessments already done appear correct but I think Area THE009 should be reconsidered as this would make an ideal site for a new build Primary school with associated playing fields and car parking. This car parking area could also be used for staff and pupils at the sixth form college adjacent on deadmans lane and this would ease the parking in the village especially The Green and Meadow Way.

Existing Primary school land could be sold off for housing, Kept for nursery class use, Part of the land sold to the church so they could build a Parish centre.

Some of the comments I have heard include, the present school site is getting overloaded, not enough room for the children to play properly, we do not want another monstrosity like the one built last year, do not want to lose any land from the recreation ground as play space is essential and hopefully a scooter park can be built in this area. I believe the council do not want to lose control of the practice football area even though an all weather pitch sounds tempting but will come with large maintenance costs.

The last few comments are not really housing related but may be if Theale develops in the next Twenty / Thirty years as people hope, Schooling will be a major issue, so get it right first time and save money in the long run.

Serious consideration must be given is not to have any more new housing in Theale until Thames Water find a permanent solution for their waste water problems.

Infrastructure:

Both Councils were very concerned about the impact on the existing infrastructure and thought that in general facilities needed improving.

Holybrook Parish Council commented after the meeting that there is a general lack of amenities and facilities in Holybrook Parish. There are for example, no shops, post office or doctors' surgery to name but a few, and further housing would inevitably mean more vehicular traffic in an area that is already stretched to cope with existing traffic volumes.

Transport:

Transport issues and the impact on Junction 12 of the M4 were at the forefront of everyone's concerns, and following the meeting Holybrook Parish Council commented that West Berkshire Council will already be well aware of the very serious concerns about the impact the IKEA development will have around Junction 12 of the M4. These two sites could not be closer to Junction 12 and if development on either of them were allowed to go ahead, this would only exacerbate the traffic problem.

The Berkshire Fire and Rescue Service will has given notice that it will be relocating its Control Centre from Dee Road in Reading to Pincents Lane and there are discussions about creating a new Fire Station located in Theale. Once these go ahead, fire appliances will need good, unfettered access to the M4 and A4. The developments with the additional traffic they will generate would only serve to worsen the problem for the Fire Service.

Education:

Education issues were also of particular concern. Schools in Calcot were thought to be full and there was concern for both the primary and secondary schools in Theale. It was felt a holistic and long term approach should be taken to the education issues in Theale - if we got it right the first time it would save money in the long run.

Theale PC has heard comments that the present school site is getting overloaded and that there is not enough room for children to play properly. If Theale develops in the next 20/30 years, schooling will be a major issue. Important to get it right first time.

Following the meeting, Holybrook Parish Council advised that Councillors would question whether the local schools are able to accommodate increased numbers of children. It is believed that the primary and secondary schools, both in Theale and Calcot are already full and if so, the education infrastructure would prove inadequate.

Other:

In general, Theale PC felt that Theale should be allowed a period of consolidation after the Lakeside site has been developed.

It was noted that about 40% of the residents of Theale parish are of pensioner age or are single occupancy households and that this should be taken into account.

It was also noted that there have been some discussions elsewhere about a new fire station being located in Theale.

Theale Parish Council commented that Thames Water must give serious consideration to waste water problems before any housing is built.

Theale also noted that none of the recreation ground should be lost because play space is essential and a scooter park could be built in this area.

Site specific comments

EUA025 - Land Adjacent to Junction 12 of the M4, Bath Road, Calcot

There was general agreement that the main issues for this site were the flooding issues on part of the site, the impact on Junction 12, the general impact of increased traffic levels as a result of IKEA and the overall noise pollution from the railway and motorway which is exacerbated by the topography of the area.

EUA026 - Land adjacent to Bath Road and Dorking Way, Calcot

It was considered that this site has potential for development but that the traffic implications would need to be carefully considered.

EUA025 - Land Adjacent to Junction 12 of the M4, Bath Road, Calcot

EUA026 - Land adjacent to Bath Road and Dorking Way, Calcot

Following the meeting, Holybrook Parish Council commented that if, as a result of the IKEA development, any major improvements were considered necessary to Junction 12, these would be prohibited if housing were already constructed on that site.

The potential for flooding is high in this area. Much of that area was under water for some months earlier this year and a thorough flood risk survey would need to be undertaken before any development took place.

This site is immediately adjacent to the busy M4. The noise level would be such that it would be most unlikely to be an attractive area in which to live.

The site also contains a WW2 'pill box'. It is believed that some while ago this was designated as a refuge for bats. This would require investigation, as would the question over whether this was considered to be a Listed 'building' of any description.

Some while ago, there was a proposal to situate a 'Park & Ride' facility in the areas now under consideration. This was rejected on appeal since even at that time it was recognised that the area around Junction 12 was congested.

There is a belief that contained within the overall Planning Strategy for West Berkshire there is an ambition to retain spatial distance between the communities of Calcot and Theale. Any development in this area would negate such an aim and would mean that the two communities were separated only by the line of the motorway.

The Parish will vigorously oppose any application for development on these sites.

EUA027 – land north of Pincents Lane, Calcot

The main issues here were to do with access and traffic and also that the site was in the AONB.

EUA037 - Former Horncastle Ford Site, Bath Road, Calcot

It was felt that this had potential for development, particularly for apartments.

EUA007 – Turnhams Farm, Pincents Hill

The traffic implications of any development here were of most concern. It was noted that Junction 12 and the Sainsbury's roundabout are already congested and that with the IKEA development access could be particularly difficult. The traffic issues would also affect surrounding sites such as EUA025 and THE005. There is also potential for flooding on the site.

THE001 - Former Sewage Works, Theale

THE002 - Whiteheart Meadow, Theale

THE005 - Land at Junction 12, Theale

There was general agreement that these should be considered as one site. There was potential for flooding on the site as it was known that both THE002 and THE005 take the flood water from Sulham Brook. Noise issues from the M4 were of concern as were the overhead power lines, access and potential land contamination issues from the sewage works in THE001.

THE004 - Land to the south of the High Street, Theale

The location of Theale Community Hall needs to be considered in any development on this site. The detrimental impact on the rear view of existing housing, access and flooding were the other main issues highlighted

THE003 - North Lakeside, The Green, Theale

The main concerns focussed on access issues which would be via St Ives Close. A planning application currently exists for half the site.

THE007 – land at Theale Boating Lake, Station Road, Theale

There was general agreement with the WBC assessment that this was currently not developable

THE009 - Field between A340 and The Green

It was suggested that this area would make an ideal site for a new build primary school with associated playing fields and car parking. This car parking area could also be used for staff and pupils at the sixth form college adjacent on Deadmans Lane and this would ease the parking in the village especially The Green and Meadow Way. There is also the potential to use this site as an overflow car park for other schools as Theale Green School will also need to be expanded. There are flooding issues on a section of the site which is waterlogged at present. If this was pursued, it was suggested that the existing primary school could then be sold off for housing, kept for nursery class use, or part of the land sold to the parish church so that they can build a parish centre.

There was concern expressed that this site should not be developed in addition to THE011 as it would be too much in this area.

THE011 - Lakeside, Theale

It was noted that the former railyard site will need to be decontaminated and that when developed, this site would increase Theale's housing by 30%.

**SHLAA Consultation Event - Purley on Thames and Tilehurst
10 February 2014**

Present

Jean Gardiner	Tilehurst Parish Council
Jacky Major	Tilehurst Parish Council
Rick Jones	Purley on Thames Parish Council
Graham Rolfe	Purley on Thames Parish Council
Tony Linden	Ward Member for Birch Copse
Sarah Conlon	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

Site specific comments

EUA35: 72 Purley Rise

Purley on Thames Parish Council have great concerns about this site. They would not want to see it as a Gypsy and Traveller site. The site has more previous planning history than that stated in the SHLAA and this should be updated. The site has had two applications refused, one of which was refused at appeal, and it has an extant planning permission for one 2-bed house.

The Parish Council are keen that the Inspector's decision on the application be considered, especially with regard to the rural nature of the area and the potential for further encroachment towards Pangbourne (12/02215/FULD – 72 Purley Rise).

EUA30 Land north of Purley Village

The site is not currently developable.

EUA34: 1053-1057 Oxford Road

This site has planning permission and development is currently under construction.

EUA10: Land between Oxford Road and Theobald Drive

The site is not currently developable.

EUA008 Stonehams Farm, Long Lane

EUA003 Stonehams Farm, Long Lane

Tilehurst Parish Council are strongly against any breach of the settlement boundary. The Parish Council stated they were aware that these sites would come forward as the next pressure points within their parish. They are outside of settlement and would encroach into the AONB which would potentially set a precedent for further development beyond these sites.

The Parish Council feel there are insufficient facilities to sustain more development - the schools and doctors surgeries are full. Whilst these two sites are currently dry there are drainage issues.

It was explained by WBC that as part of the Local Plan process the settlement boundaries would be reviewed and any site allocations would be included within the revised settlement boundary.

After further discussion it was considered that developing part of EUA008 would be the most sensible approach given the area will need to accommodate more houses – this would enable the settlement boundary to be amended to include some of EUA003 and EUA008. This would need further consultation with the Parish Council and local Ward Members should it be progressed.

EUA031: Land to the east of Sulham Hill

This site is used for equestrian purposes and is seen as important open space by the community. Concern was raised as to where the horses would graze and people ride horses if this site was developed – an alternative would need to be found, but it was felt that there were no alternatives.

EUA032: Land to the east of Sulham Hill between Barefoots Copse and Cornwell Copse

EUA033: Land to the east of Long Lane and south of Blackthorn Close

The Parish Council would be very concerned about the development of these sites. They are currently very wet. Development here would impact on the AONB and the adjacent woodland. Despite the woodland being poorly maintained, it is seen as valuable open space by the community.

It was explained by WBC that development on sites within the AONB would count towards meeting the housing figure for the AONB but would actually be meeting the needs of the Eastern Urban Area.

Tilehurst Parish Council feel EUA031 / 032 / 033 are most vulnerable and they would rather other sites were developed before these are considered.

EUA024: The Colonade, Overdown Road

The site is within the settlement boundary and therefore there is a presumption in favour of development.

EUA036: Land at Little Heath Road

The site is currently not developable. The location of the site within the AONB was discussed, along with the impact on the road network. Kiln Lane experiences drainage problems and therefore the site can be very wet.

EUA001: Dacre, New Lane Hill

EUA011: Land north east of Calcot Park Golf Club

These sites are within the settlement boundary and therefore the Parish Council are not surprised that they have been submitted as part of the SHLAA. Whilst not very accessible, the Parish Council would not be against development on these sites.

EUA005 Land at Calcot Golf Course, Calcot Park

Same comments as EUA001 and EUA011.

EUA016 Murdochs Diner, Bath Road

The Parish Council would not be against the development of this site, but stressed that any development would need to be appropriate.

EUA007: Turnhams Farm, Pincents Lane

The Parish Council are very concerned about this site. It has very poor access, is used by the community to walk and it is seen as an extension to existing open space within the parish. The pressure that would be placed on Tidmarsh Road, Langley Hill and Pincents Lane would be significant in terms of traffic generation. The expected increase in traffic within the area when IKEA opens will only exacerbate the existing problems.

There is strong opposition to development on this site by the local community, Ward Members and MP.

The Parish Council would like to see the Inspector's Report for the previous application be taken into account when considering this site (09/01432/OUTMAJ).

EUA004: Land at Pincents Lane

EUA027: Land north of Pincents Lane

Both sites have poor access and would have a significant impact on Pincents Lane and the surrounding roads. The Parish Council also have concern about encroaching into the AONB.

EUA013: Turnhams House, Pincents Lane

This is a large plot with one house and could potentially fit a fair number of dwellings. Accept that it would be considered as previously developed land but would not like to see flats on this site.

The Parish Council would like to see some small bungalows for the elderly within the area, and could see potential for EUA013 to provide such development. It was stressed that with an aging population there needs to be consideration given to providing bungalows near to shops, bus stops etc to allow people to downsize but stay within the area.

EUA025: Land adjacent to Junction 12 of the M4

EUA026: Land adjacent to Bath Road and Dorking Way

Tilehurst Parish Council would be against any development on either of these two sites. EUA025 is within the flood plain and there should be sufficient land to soak up flood water. Development on EUA025 especially could result in flooding within the Beansheaf area.

General comments

Purley on Thames Parish Council raised concern over the loss of identity of settlements/villages. There is concern that development will result in Pangbourne and Purley on Thames merging similar to creeping development between Tidmarsh and Pangbourne. The identity of villages and the rural character of the area is what makes the District so attractive and it is important that this is maintained.

Purley on Thames has experienced a lot of infill development in recent years, mainly large family homes. There are no problems in selling these homes so there does appear to be a level of demand but the Parish Council are not aware of any latent demand beyond this. They have explored the possibility of carrying out a Housing Needs Survey for the parish but Purley is not seen as rural, therefore there is no support from the Rural Housing Enabler for this study.

Purley on Thames Parish Council suggested an alternative site for development which they would have no objection to, however this site has not been promoted to us.

Tilehurst Parish Council would not be against development on EUA037 as the site is already within the settlement boundary and providing housing would improve the image of the site. The site has been marketed for a car dealership but there is no market for this.

Tilehurst Parish Council do not see that there is much scope within the parish for further development. There is a strong desire to keep green spaces and allow areas to absorb rainwater to alleviate flood risk.

It was asked how windfalls are taken into account and it was explained by WBC that an element of windfalls are included within the housing figure but it needs to be demonstrated through the plan process that there are sufficient deliverable sites to meet demand without relying on windfalls.

**SHLAA Consultation event – Bradfield South End and Pangbourne
10 February 2014**

Bradfield South End

Present

Andrew House	Bradfield Parish Council
Paul Isherwood	Bradfield Parish Council
Quentin Webb	Ward Member for Bucklebury
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Alistair Buckley	West Berkshire Council

The Parish Council began by explaining that the parish was generally happy with organic growth rather than large scale development. This is set out in the parish plan. The size of the SHLAA sites was of concern and there was a view that the infrastructure of the village could not cope. There is one shop and one pub. Concern was also expressed about light pollution and noise pollution. There is limited public transport which could be an issue if social housing were to be provided in the village. Generally accessibility was felt to be poor, specific issue include Union Road, which has limited volume and South End Road which runs parallel to the A4 and therefore gets used as a rat run. Impact on the AONB is a further issue – it was explained that additional landscape work needs to be carried out for these sites.

Site specific comments

BRS002: Corner of Cock Lane and South End Road

This is a smaller site which was considered to better reflect the Parish Council's preference for incremental growth and is therefore less unacceptable. Development in the area has generally been along arterial routes and this type of ribbon development may be better. Some concern over the access onto Cock Lane.

St Peter's Church issue was discussed, as St Andrews may be closing, with St Peter's expanded as an alternative. This would be funded by housing at the back of the church.

BRS003: Land to the north of South End Road

Issues with the width and the ownership of the current access were discussed. Properties would need to be purchased to resolve this. There are also Tree Preservation Orders to the east of the site and at present there is standing water on the site. If this was developed together with BRS004 and BRS005, this would have a disproportionate impact on the settlement.

There is water run off from BRS003, BRS004 and BRS005.

Potential for light and noise issues.

The lack of footpaths and on street parking is an issue for the local school.

BRS004: Land off Stretton Close

This site is well screened by trees and could be more acceptable for a small amount of development. The site regularly has standing water on it. Access considered acceptable.

BRS001: Land to the south of South End Road

Concern over the differences in levels on the site and the flood risk, particularly in the southern part of the site. This would have implications for future flooding at Pangbourne. The scale of the site would distort the village and is contrary to the organic and linear development preferred by the Parish Council and set out in the Parish Plan.

Potential for light pollution issues.

Lack of employment opportunities within the village would result in an increase in commuter traffic.

Development would increase flooding downstream due to surface water run-off from the site.

BRS005: Land at Crackwillow, Cock Lane

The road was considered sufficient for the Montessori school; however additional traffic would cause a serious hazard onto Cock Lane which is a narrow rural road.

Pangbourne

Present

John Higgs	Pangbourne Parish Council
Mavis Law	Pangbourne Parish Council
Pamela Bale	Ward Member for Pangbourne
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Alistair Buckley	West Berkshire Council

The Parish Council recognised that there are limited sites available within Pangbourne, due largely to flooding issues.

PAN011: Pangbourne College Boat House

This was not felt to be suitable for any development due to its position adjoining the River Thames. The Parish Council agreed with the Council's assessment of not currently developable.

PAN001: Jesmond Hill, Bere Court Road

This site, which has been assessed as potentially developable could be acceptable to the Parish Council for a smaller number of dwellings. However the access, along Green Lane, would be of concern.

PAN002: Land north of Pangbourne Hill and west of River View Road

This may be acceptable for a smaller amount of houses. Landscape work shows that only part of the site would be appropriate. The Parish Council thought that it would be accessed off River View Road. Access onto Pangbourne Hill would be difficult, particularly for a larger number of dwellings. Visibility would be poor. The Parish Council felt that there would be a need for a footpath into Pangbourne. Is the road here wide enough for this?

PAN009: Burghfield, Pangbourne Hill

PAN010: Land off Bere Court Road, Centenary Field

Both of these have been assessed as not currently developable by the Council. The Parish Council agreed with this for reasons including the poor accessibility, distance from the main part of Pangbourne and the more rural nature of these sites. The landscape impact in terms of the AONB was a further issue.

SHLAA Consultation Event – Chieveley 4 February 2014

Present:

Mike Belcher	Chieveley Parish Council
David Cowan	Chieveley Parish Council
Tracy Snook	Chieveley Parish Council
Ian Wooler	Chieveley Parish Council
Alistair Buckley	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

The parish council held a public consultation event with the residents of Chieveley on Saturday 1 February 2014.

General feedback – housing should meet local needs.

The village is seen as doing well. There is a feeling that the development at Bardown is the only development needed in the village.

People accept that development is required and feel that about 50 dwellings would all the village needs.

Following the consultation event, the parish council submitted further comments which are included in Appendix 7.

Sites within Chieveley Parish, but close to Hermitage (eg. around Oare) have a Hermitage code as they relate to Hermitage village. Oare is not a service village and does not have a settlement boundary, therefore sites will only be considered if they relate well to Hermitage.

Hermitage Parish Councillors confirmed that Manor Lane Oare was considered as countryside and not part of Hermitage and that access on Manor Lane was a very poor standard. Chieveley Parish Councillors did not consider there was a rational basis for expanding the Hermitage settlement boundary to include Oare and therefore the HER011 sites on Manor Lane should remain in the countryside and no allocated within settlement boundary.

Site specific comments

CHI021: Land at Bardown

This site is deliverable, although nothing has happened on site. The Parish Council supported the redevelopment of the site in principle at the time of the application and continues to do so although they made objections to the adequacy of the landscaping and would continue to seek an improved scheme. Planning permission is close to expiring (approved 18 March 2011, with condition for development to start within 3 years – will expire on 18 March 2014) unless work starts on site or renewal application is submitted. It might be possible to review the settlement boundary at Bardown but the site would remain 'previously developed land'.

Landscape issues mean that the site is not a great place for development, but local people accept that it should be redeveloped. However, many people consider the approved density to be too high (75 dwellings).

CHI002: Land west of Chieveley Village and north of Manor Lane

A high number of people had raised objections to the scale of this site but some development at this site at low density may be ok. The availability of the site is uncertain.

Landscape assessment work would need to be taken into consideration and good landscaping to the western boundary to reduce impact on the AONB.

CHI016: Downend, Morphetts Lane

Access to the site is via an unmade track and the need for the track to be adopted by WBC would be an issue. Site could be included via the settlement boundary review, rather than through allocation of the site, this was seen as the only possible way the site could be developed. Parish Council felt that this location is in the countryside and there was no obvious reason to change the settlement boundary to include all of Morphett's Lane.

CHI007: Land north of Manor Lane

Site was associated with the previous local plan site to the north (The Green) as protected open space as set out in the Appendices to the previous local plan as Adopted 2002 (page 150) and this had been agreed by the landowner at the time, when the site had been allocated, with the right of veto to be given to the Parish Council. The policy protecting the land has not been saved, and therefore, does not apply any more. WBC to check agreements made regarding the land.

General feeling of the Parish Council is that this site should stay as agricultural land/open space in line with what had been agreed previously.

Some general points were made about sites on the western side of the village: the Village Design Statement describes much of Chieveley as 'hidden' from the outside and this should be maintained; traffic impact on the High Street is a major concern; drainage systems are stressed and the High Street suffers from surface water runoff.

CHI011: Chieveley Glebe, East Lane

CHI008: Land adjacent to Oxford Road

A number of people had stated that they would rather see development occur to the east of the village than the west, with access on to Oxford Road or East Lane rather than the High Street.

There are traffic issues associated with the doctor surgery and the cemetery is full, therefore, development here could help to solve some of these issues.

The Parish Council thought this was a potential option for the next stage of consultation.

CHI010: Land adjacent to Coombe Cottage, High Street

Access to the site is limited and is opposite a nursery school.
Could be a site considered as part of the settlement boundary review.

7 units too high – possibly 4.

CHI015: Land at School Lane

This site has not had a landscape assessment done on it. Comments from the consultation event were closely balanced regarding this site, many people felt quite positively about the site if it could deliver parking for the school, although it did raise other issues of traffic outside the school and landscape impacts. The Parish Council would want to see some formal/enforceable agreement in place to ensure the parking for the school is provided should the site be considered further and with a proper landscape assessment and landscaping scheme.

CHI017: The Old Stables, Green Lane

CHI001: The Colt House, Green Lane

The Council are not really in the business of allocating gardens, if these were to come forward it would be through the Settlement Boundary review.

The Council had recently refused planning permission on part of CHI017 and there is a September 2013 appeal decision also refusing development in which the Inspector found this to be a natural break in built development on the west side of Green Lane where development would harm the character and appearance of the surrounding area.

This area of the village is seen as an area of special rural character and a green lane in the village. There are strong views from residents and the Parish Council that the settlement boundary should remain as it is in this area.

CHI009: Land south of Graces Lane

The site is ruled out on landscape grounds, and would have a bit impact on the visibility of the village from outside.

General comments

- Better health services and facilities are needed (Doctors surgery is at capacity)
- Chieveley Primary School is full and is there capacity at the Downs?
- Traffic and safety, especially through the High Street and outside the schools & nursery.
- Public Open Space is important.
- Rights of Way
- Landscaping to limit impact on the AONB.
- Social Housing
- Pre-school / nursery places
- Will provide copy of Consultation Report when available.

Settlement Boundaries

Nothing fundamentally wrong with tried and tested settlement boundary criteria which have served their purpose well. No reason for settlement boundaries to change where nothing much has changed e.g. Morphetts Lane and Green Lane.

CP said settlement boundary criteria and reviews would be included as part of Issues and Options consultation. This would be when any settlement boundary changes below service village level would be considered.

SHLAA Consultation Event – Compton 4 February 2014

Present

Mark Birtwistle	Compton Parish Council
Keith Simms	Compton Parish Council
Virginia von Celsing	Ward member for Compton
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Sarah Conlon	West Berkshire Council

Prior to discussion on the individual sites the group raised a number of points as set out below:

Compton Parish Council (CPC) queried how the Supplementary Planning Document (SPD) for the Institute site fits in with the SHLAA sites and what weight does it now have? It was explained by West Berkshire Council (WBC) that the SPD relates to a particular site that was identified within the Core Strategy as an opportunity site. The SPD still holds the same weight in decision-making.

It was queried why the SHLAA commentary for COM010 does not mention that it is contaminated, but the commentary for COM004 does. It was explained by WBC that this is because the Council have varying amounts of information for each site within the SHLAA. Due to the work on the SPD for COM004 WBC know more about the site and know that there is a degree of contamination on the Institute site. The Council do not have such information for COM010 and therefore it is not within the SHLAA commentary.

The Parish Council feel the SPD for the Institute site takes a reasonable approach to development and accept there will be development on this site. The SHLAA now creates an element of confusion as there are so many other sites now being considered. It was explained by WBC that the SHLAA does not allocate sites but identifies those sites that are available within the village for development or allocation over the plan period to meet the identified housing need. There is no guarantee that the Institute site will come forward for development within this plan period, therefore the SHLAA sets out other possible options should they be required.

Site specific comments

COM001: Land to the east of Yew Tree Stables
COM012: The Paddocks east of Roden House

Keith Simms declared an interest in this site given the location of his house. The Parish Council feel development on these sites would merge the village with the industrial units beyond – the distinction should be maintained. COM001 is considered as important open space to the community and whilst access to the site is good, the community would be against development on this site. The topography of the site could result in any development being visually prominent. The impact on the conservation area would need to be considered.

Development of the site would be detrimental to the character of the village and would fail to enhance the AONB.

COM002: Land to the south east of Compton

The Parish Council agree that this site is not currently developable. The railway line forms a physical boundary to the settlement and the Parish Council would not like to see development on the other side of the railway line – it is not well related to the existing village and development outside of the boundary would be considered inappropriate. Flood risk on this site is more significant than the Environment Agency flood zones identify. Proximity to Scheduled Ancient Monument is a concern.

There is also potential for flooding on the site – the site and access road has suffered flooding recently as can be seen in Appendix 3.

COM004: Pirbright Institute site, High Street

Development of this site should be carried out prior to introducing new sites within Compton. The Council insists that the cricket patch is protected from development.

The Parish Council would not like to see this site left derelict and vacant, and would support allocation of the site within plan. It is possible that the Institute may not vacate the site for another 2 -3 years.

COM004A: Greens Yard, High Street

This site already has planning permission.

COM005: Fairfield

This site already has planning permission.

COM006: Mayfield Farm, Cheseridge Road

COM007: Land between Cheseridge Road and Illsley Road

Development on these sites would extend the village too far. Flood risk and access with COM007 raises concern.

Potential access to COM007 from Illsley Road is not deemed to be satisfactory.

There is significant concern over the risk of flooding to COM007 which provides a significant flood plain protecting the village. The site recently flooded, as shown in Appendix 3.

COM008: Rear of Mayfield Cottages, Illsley Road

This site is very open and landscape impact would need to be considered.

There is significant concern over the risk of flooding on this site which provides a significant flood plain protecting the village. The site has recently flooded as Appendix 3 indicates.

COM009: Land between Illsley Road and Churn Road

This site would be difficult to access off the Illsley Road, and access via Churn Road would not be desirable given its rural nature. Increased traffic along Churn Road could impact on the cricket pitch if additional land was required for visibility splays/road widening. However, a portion of this site is seen by the Parish Council as

the most suitable option – area between COM011 and COM010 subject to ensuring the issues re: access can be overcome.

COM010: Land to the west of Churn Road

Contamination issues with this site and access via Churn Road is undesirable.

COM011: Land to the north of Illsley Road

The Parish Council would not like to see this site developed as it would infill the area between the existing settlement and the small cluster of properties by Down House – this would extend the village too far along a busy road. The access to the site raises concern.

General comments:

In respect of sites COM007/008/009/010/011, CPC comment that the SHLAA document refers to site contamination in COM004, however there is concern that sites COM007/008/009/010/011 will also have similar contamination due to being owned by the same owner and therefore having the same use.

The Parish Council suggested that a long thin area of land to the south west of the village, opposite the Downs School, would have been an acceptable location for development as this would be in close proximity to the school and allow for reduced speed limits along this stretch of road. No land in this location was promoted to the Council through the SHLAA process.

It is felt that no extension to the settlement boundary should be considered until the plan for the development of the Pirbright Institute Site, COM004, have been finalised and all brownfield sites within the village have been developed.

**SHLAA Consultation Event – Great Shefford
27 January 2014**

Present:

Sue Benn	Great Shefford Parish Council
Jim Carter	Great Shefford Parish Council
Gareth Knass	Great Shefford Parish Council
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Sarah Conlon	West Berkshire Council

Site specific comments

GSH002: Land south of Wantage Road

The Parish Council would object were this site to ever come forward. They noted that water runs down from the hills into the site. The landowners of the site have stated in the past that they would sort out flooding.

It was highlighted that the Parish Plan states that there should be no additional housing outside of the settlement boundary.

GSH001: Land west of Spring Meadows

Following the session, GSPC discussed the site at a Parish Council meeting. The Councillors, whilst having no objection to some development on the site, have a number of serious concerns that they wish are taken into account should the site be developed. The points from the parish council meeting are incorporated with the notes from the session below.

The Parish Council has discussed this site in the past – objected at the time due to Parish Plan reasons. It was noted that development would affect residents in Spring Meadows.

The discussion around the site focused primarily on flooding and access/highway issues. Overall, flooding was considered to be the main issue for the site.

Flooding:

- Parish have concerns that technical solutions will not work.
- 2007 flooding caused by significant storm event. Flooding could be exacerbated by further development.
- Some of the houses adjacent to the site have been affected by flooding (the site was a water meadow).
- Flooding issues need to be considered before development takes place in the Lambourn Valley.
- The capacity of the sewage network was questioned – Thames Water has told the Parish Council that they have solutions, but there are still issues.
- Development should only be allowed once the Lambourn Valley Flood Risk Management and Action Plan issues have been satisfactorily resolved, and that hydrological cumulative effects be fully considered (flooding and sewerage issues here);

Access:

- Spring Meadow, which the site adjoins, is a narrow road and there is a lot of on-street parking. There are no pedestrian walkways in some parts.
- Construction access – there are alternatives to Spring Meadow – for example the farm track

Density:

- A development should be at a lower density than the existing estate at Spring Meadows (not taking into account the recently built flats on the former football club ground) and of larger family dwellings;
- The only developable land should be considered when calculating housing numbers

Open space:

- That there should be an element of open space mirroring the open space along Spring Meadows and Blakeney Fields

Design:

- That design should ensure that there is no future opportunity to extend elsewhere in the AONB (dead end roads)

Parking and traffic

- That there should be substantial car parking provision for new dwellings in excess of 2 off road spaces per dwelling minimum average, and that visitor parking spaces should also be provided and consideration given to mitigate the existing parking issues on Spring Meadows;
- That construction traffic should be required to come via the farm access, not Spring Meadows/Blakeney Fields;
- Pavement issues and parking issues in Spring Meadows should be further considered along with very careful and sympathetic design of join to existing road
- Mitigation for the poor road condition in Spring Meadows should be provided through hypothecation of development highways contributions;

Rights of Way

- That there should be footpath link(s) to the right of way around the development

Affordable Housing

- That given our updated affordable housing survey work, affordable housing provision should be reduced to the level that there is demonstrable need from a family within the Parish or immediate local downs area, i.e. be based on local need only;

Other issues:

- When the land adjacent to GSH002 was originally developed, it was felt that this site may be able to offer recreational benefits.
- Lack of services in Great Shefford, e.g. public transport. The Parish Council queried if this would be considered – West Berkshire Council (WBC) confirmed

that it would in the site selection process for the Site Allocations and Delivery Development Plan Document.

- Housing numbers – need to consider the rise in height of the land – some existing dwellings could be dominated by any future development.
- That there should be a buffer zone between the first dwellings and existing properties at Spring Meadows, given the site levels, and that this should be informal green space landscaping in keeping with the remainder of Spring Meadows;
- Street lighting should be at a much reduced level than present in the Spring Meadows estate (which already impacts on the AONB), and any provision should include an appropriate impact assessment on the AONB with suitable mitigation;
- Regard should be given to wildlife in the local area in scheme design and open spaces, any impacts on boundaries and hedges should be assessed and mitigated for;

General comments

Northfield Farm – various applications for dwellings here and the Parish Council have objected in the past. They queried if there would be any development here. WBC confirmed that rural sites are not being considered at this stage in the process. Any further development in this location would be dealt with on a case-by-case basis.

**SHLAA Consultation Event – Hermitage
4 February 2014**

Present

Ruth Cottingham	Hermitage Parish Council
Margaret Goodman	Hermitage Parish Council
Quentin Webb	Ward Member for Bucklebury
Alistair Buckley	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

Sites within Chieveley Parish, but close to Hermitage (eg. around Oare) have a Hermitage code as they relate to Hermitage village. Oare is not a service village and does not have a settlement boundary, therefore sites will only be considered if they relate well to Hermitage. Chieveley Parish Councillors asked why Oare sites had been considered at all as Oare is not in the settlement hierarchy, CP said they were included in the SHLAA in order ensure that all alternative sites for Hermitage had been considered.

A potential employment site near to HER001 has not been submitted as part of the SHLAA, although conversations have taken place between the developer and the Parish council.

Site specific comments

HER001: Land off Charlotte Close) / HER004: Land to the SE of The Old Farmhouse

This site is seen as being key to preventing flooding on Lipscomb Road and the surrounding area. A drain runs through the site (from HER004 into HER001). Flooding occurs near to the Priors Court Road Roundabout and the Village Hall has been flooded in the past (flooding particularly occurred in the area in 2007).

Access to the site could be an issue, especially if access is required from Charlotte Close.

Hermitage is desperate for allotments, Parish Council have approach the land owners of HER004/009. This use could be considered on areas not suitable for development.

HER009: North of Primary School, Hampstead Norreys Road

Development in this area would ruin the rural aspect of the school. The site, and surrounding woodland is a wildlife corridor. Development in the area would break up this corridor.

There are traffic issues associated with the school, and this is likely to get worse if development occurred at this site. The Parish Council have asked the council for a parking survey for outside the school. Generally there are a lot of HGVs travelling through the village

There are potential flooding issues around Orchard Close. Some work was done following the 2007 floods, but there is often standing water following prolonged heavy rainfall.

Sewer flooding is also an issue in the area. Thames Water has installed a pumping station, but this is currently at maximum capacity as are the drains running through the village.

Accessibility and road widths need to be considered which ever sites are taken forward. There must be adequate parking on site.

There are no health services in the village, residents have to travel to Chieveley, Compton or Chapel Row. There is a desire in the parish plan to provide some level of health facility (even if only part time) in the village.

HER010/012/013/014/015: Site around Oare

Access to these sites is poor, Manor lane is very narrow. Oare isn't seen as part of Hermitage. The Motorway should not be seen as a barrier for infill development.

Landscaping is the key factor.

HER011: North of Manor Lane

Parish council questioned why this site was considered to be developable while the other sites around Oare are considered not developable. This was due to the location of the eastern most part of the site adjacent to the B4009.

Concerns related to the proximity of the motorway. Hermitage Parish Councillors confirmed that Manor Lane Oare was considered as countryside and not part of Hermitage *and that* access on Manor Lane was a very poor standard. Chieveley Parish Councillors did not consider there was a rational basis for expanding the Hermitage settlement boundary to include Oare and therefore the HER011 sites on Manor Lane should remain in the countryside and not allocated within settlement boundary.

HER016: Land off Hampstead Norreys Road

Seen as very close to the motorway, which could cause noise and health issues for residents.

The proposed gypsy site to the north of the motorway was objected to by the Parish Council on similar grounds.

General comments

The Parish Council raised the issue that Hermitage has seen a significant growth in number of homes in the village (c. 50%) in less than a decade without any upgrade to the infrastructure.

Fears raised that new developments would be as overfilled as the development at Forest Edge and that concerns re. developments in neighbouring villages would have significant impact on Hermitage in terms of traffic throughput.

Gypsy and Traveller sites

The Parish council asked whether any G&T sites had been submitted in the SHLAA. The Council responded that only 1 potential G&T site has been submitted, however,

the council does need to provide a 5 year land supply for sites, so will be looking for sites.

HER009 is seen as the most acceptable site but would need to improve the road network and have a decent (low) density of development. A Landscape Assessment of the site would be required.

HER001/004 is not really seen as being suitable, although a few homes off Charlotte Close could be considered. The traffic impact would be less here than in the north of the village.

Education

The Schools are full; therefore, there are issues of getting children into the local school.

Flooding

Flooding in the village is a major concern for the parish council. WBC is currently consulting on the Local Flood Risk Management Strategy, any comments on the strategy or details of localised flooding should be fed into the consultation. <http://www.westberks.gov.uk/index.aspx?articleid=28425>

**SHLAA Consultation Event – Hungerford
27 January 2014**

Present

Gillian Holmes	Hungerford Town Council
Rob Megson	Hungerford Town Council Consultant
Denise Gaines	Hungerford Town Plan
Chris Scorey	Hungerford Town Plan
Chris Ticehurst	Resident of Hungerford
Liz Alexander	West Berkshire Council
Alistair Buckley	West Berkshire Council
Sarah Conlon	West Berkshire Council
Caroline Peddie	West Berkshire Council

The group raised a number of questions (as follows) prior to discussion on the individual sites:

- The clash of meetings (Planning and Education) has meant that the availability of Town Councillors is limited.
- It was asked when consultation will take place on the Site Allocations and Delivery DPD. WBC explained that it is difficult to put a timescale on this at the moment but there should be more consultations later this year.
- There was a discussion around housing densities and concern was raised that the yields from the sites within the SHLAA seemed very low. It was felt that if a site was to be allocated with a housing figure based on 20 dwellings per hectare (dph) as used in the SHLAA this could result in the site actually being developed at a higher density and thus a higher number of houses in total would be developed than that allocated or expected. There was also concern that low density developments may prove unviable or that only large 4 / 5 bed houses would be built which may not meet need/demand. It was explained by WBC that a density of 20dph was used within the SHLAA for all greenfield sites within the AONB to ensure consistency. The Core Strategy includes a policy on housing mix and type which states that lower density developments may be appropriate in certain parts of the District because of the prevailing character of the area and the sensitive nature of the surrounding countryside or built form. The density used gives an indicative potential only, more detailed work may result in a different density for a particular site. In some cases the Council have discounted the site area to take account of constraints such as flooding, and this gives a lower developable area than that submitted. As a result the development potential of the site set out within the SHLAA is less than that being promoted by the landowner/agent in some instances.
- Concern was raised about the education provision within Hungerford, especially regarding the expansion of John O’Gaunt School and the number of houses required to sustain its expansion as set out within the Education Plan. It was explained by WBC that the Education Plan was not reliant on a specific number of houses. Demographic growth within Hungerford has created additional demand on existing provision and this growth is expected to continue, along with housing growth.

- The figures provided within the Infrastructure Delivery Plan (IDP) for Education are very specific and Hungerford Town Council asked where the figures have come from and if these calculations could be made available. It was explained by WBC that the IDP sets out details of the infrastructure identified by the Council and service providers to support the delivery of the housing figure set out within the Core Strategy. The figures provided from WBC Education Department are based on approximate figures for one primary school. The figures were put forward to assist in the formulation of a Community Infrastructure Levy (CIL) for the District, which operates in a different way than S106.
- It was emphasised that WBC Education Department are a key partner in the site selection process and communication between WBC Planning and Education happens on a regular basis and is ongoing.

Before discussion on the SHLAA sites began it was reiterated by WBC that additional landscape work will be carried out on sites within the AONB, particularly for those sites submitted in 2013. The Landscape Assessment carried out for the SHLAA sites pre-2013 is still valid and formed part of the evidence base at the examination of the Core Strategy.

Site specific comments:

HUN001: Rear of Westbrook Farmhouse, Smitham Bridge / HUN008: Hungerford Estate / HUN026 Land at north Standen Road

The topography of HUN026 (especially the larger of the two sites) would make it difficult to develop. Any development would be prominent in views within the AONB. The rural exception site has changed the landscape in views from the west given the steeply pitched roofs. Any development on this site would need to be carefully considered, along with density.

The community have expected for some time that HUN001 would be developed. The landowner has landscaped the south / western boundaries with a strong tree line. Risk of flooding from the river needs to be considered. This site would be seen as the most logical extension to the settlement, but landscape impact should be considered.

HUN008 is considered by some of the landowners to be third tier industrial units. Some units are currently vacant, but there does not appear to be a rush from the landowners to redevelop this site. Given the site is surrounded by residential uses the mix of HGVs with residential vehicle movements can cause problems. The site is not working effectively as an employment site at present but it could in the future. Mixed views on this site.

HUN003: Hungerford Veterinary Centre, Bath Road / HUN005: Folly Dog Leg Field / HUN006: Land at Eddington / HUN015: Land at Bath Road / HUN020: Hungerford Garden Centre, Bath Road

These sites all have easy access to the M4. Traffic congestion is a big concern for Hungerford Town Council. Development in the north of the town would mean less traffic travelling through the town. The distance from these sites and the centre is within walking distance.

HUN003, HUN015 and HUN020 are all previously developed. Unsure how the community would feel about the loss of the garden centre should it be redevelopment but accepts that the site has been promoted for development.

Large underground fuel pipe passes across HUN005. The developable area of this site has been reduced to take account of this.

HUN005 is not favoured for 2 main reasons: 1) extension up the slope is too sensitive; 2) extension along the road to create ribbon development would not be well received by the town.

HUN004: The Chilton Estate, Eddington Lane

Generally supportive of this site – access would not be seen as a show-stopper and a river path from the bottom of the site would provide a walkway into the centre. Maybe consider only part of the site being developed.

HUN006: Land at Eddington

Development here would be an extension to the current development. This is an option even if the other sites to the north of the town are not developed. Access to this site is very steep. Views across from the Common need to be considered.

HUN007 Land east of Salisbury Road / HUN022 Land to the west of Salisbury Road

Concern was raised with developing sites to the south of the town – it was noted that given the size of these sites the traffic generated would have severe implications on the town as all traffic would need to go through the centre and would exacerbate the existing problems. There was also concern of development creeping further south beyond HUN007.

HUN022 has a smaller developable area than the promoted site area. The Town Council mentioned that a reservoir is located beneath HUN022.

HUN007, as with HUN022, is a long way out of the existing centre and not easily accessible. It was felt that at the moment the current built form reaches the crest of the hill and should not go any further. Concern was raised regarding the views within the AONB. Whilst it was acknowledged that the site was accessible to the school, it was felt that the distance from the centre was too great to overcome this.

HUN011: Land off Marsh Lane / HUN012: Land off Smitham Bridge

Access to both sites is a significant constraint. The Town Council would not like to see these sites developed. The area has a very rural feel and is popular with walkers. The flooding issues are of great importance and the relationship of any development with the canal would be a concern. Development here could exacerbate the flooding risk.

In respect of the flooding, while the site was not flooded, it was pretty boggy and the water level high enough so it was close to flooding.

HUN012: Land off Smitham Bridge

Marsh Lane east of the allotments has been partially underwater for a period.

HUN013: Charnham Park / HUN014: Charnham Park

These are sites within a Protected Employment Area. Planning permission for a hotel was granted at appeal for HUN013. Charnham Park is seen as a good quality employment site, and development of either HUN013 or HUN014 for residential could set a precedent and would not be acceptable to the Town Council. The general view of the Town Council was that it would not want to see any employment land/sites lost to residential. It was felt there were better sites which could be developed.

HUN027: The Triangle Field, adjoining the former Priory, Priory Road

This site is a vital facility and recreation area for the town. Concern was raised about the comment within the SHLAA regarding this site and its availability. The Town Council have a long term lease for this site, so there was uncertainty as to why the site was in the SHLAA.

Cllr Cole gave assurances that the recreation space will remain as such in perpetuity, and will discuss the terms of the lease with the Asset Management Team. It was agreed that the text within the SHLAA would be updated to reflect the situation.

General comments and questions

It is noted that as part of the Hungerford Town Plan work was carried out to gather the views of the local community towards development in the town. Generally it was felt that some development would be supported, but that this should be organic growth (smaller sites around the town), rather than one or two big sites. There was a consensus that as whole Hungerford should accommodate no more than 250 dwellings over the whole of the plan period. It was noted that 90 dwellings already have planning permission.

What is to stop a developer putting forward a large site for planning permission once we have already allocated sites within the Plan and it is adopted? This could result in Hungerford taking more housing than allocated, so what are the mechanisms to prevent this?

It was explained by WBC that a landowner/developer could submit a planning application at any time, as they currently do. But if a site outside of the settlement boundary came in once the Plan was adopted and housing sites had been allocated to meet the housing requirement, then this development would be contrary to policy. Such an application could end up being determined at appeal.

Does the settlement boundary have any significance and will the allocations extend the settlement boundary?

It was explained by WBC that the settlement boundaries will be reviewed to include any allocations. The current settlement boundary does still hold significant weight in planning policy terms, with a presumption in favour of development within the settlement boundary.

What percentage is factored into the 5year land supply for windfalls?

It was explained by WBC that an element of windfall development was factored into the figures based on historic pattern of windfalls across the District. This can only ever be approximate.

Why was Lancaster Close (HUN019) removed in this version of the SHLAA?

The Council were informed by Sovereign Housing that they do not currently have plans to develop the site.

**SHLAA Consultation Event – Kintbury
27 January 2014**

Present

Andrew Roles	Kintbury Ward Member
Chris Trigwell	Kintbury Parish Council (Clerk)
Paula Amorelli	West Berkshire Council
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council

Apologies

Tim Davis and Darren Pearce (Kintbury Parish Council)

In preparation for this meeting Kintbury Parish Council had discussed what approach to take to the sites. They felt they had 2 options –

1. Discuss sites and suggest preferred sites
2. Discuss sites only.

Didn't really want to suggest preferred sites, as feel that they have received quite a lot of development since 2006 (about 150 dwellings).

Option 2 was more favourable to them, and therefore, specific discussion of preferred sites had not taken place prior to this meeting.

They did want to stress that the infrastructure of the village, in particular roads and traffic impact, needs to be taken into consideration.

Site specific comments

KIN001: Kintbury Park Farm, Irish Hill Road

Does not relate well to the settlement. Is very visible from the surrounding area, including from the A4.

KIN002 / KIN005: Kintbury Park Farm, Irish Hill Road

Developer has spoken to the Parish Council, who are not keen for these sites to be developed as this would lead to the village extending to the east.

KIN004: Kintbury Park Farm, Irish Hill Road

This site has a long history of proposals for development.

The Parish Council were concerned that the road would have to be widened, and there would be issues with Burtons Hill. The pavement into the village is intermittent.

There was a feeling that development of the site would change the character of the village. Unlikely to enhance the character of the village, it would just be creating development.

This site, along with KIN001, are the first parts of the countryside as you leave the village to the east.

KIN0066 / 007/ 009 / 015: Land to the east of Layland Green

The Parish Council noted that these sites are situated on old clay workings and many of the houses in the area have had to be underpinned due to subsidence. The area is very boggy and there are springs at the top of the hill. Issues of drainage / water diversion would need to be considered.

Landscape assessments have been done for these sites which indicate that only part of the sites would be suitable for development, mainly along the existing building line.

KIN015 is quite steeply sloping.

The Parish Council considers that some infill development in this area would not be completely inappropriate, although large development would be.

They thought that access onto Layland Green would probably be ok.

KIN007 could have access from Craven Close. Cars do park along the road, which could be an issue.

KIN008: Land to the east of Layland Green

They do not really want to see the village extended to the east / south east.

KIN011: Land adjoining The Haven

Access to the site has been left at the end of The Haven, although the road is narrow. Access from the track between KIN011 and KIN016 would not be acceptable to the Parish Council.

They thought that Sovereign Housing may have some involvement with this site.

The site is well screened and cannot really be seen from the wider countryside. There could be some potential for wider development of The Haven which was originally an area of affordable housing (much of which is now in private ownership).

Development of the south eastern part of the site would leave a gap (gardens) between the existing building line and the new development.

Felt that generally residents of Kintbury could see this as an easy option. Although residents of The Haven may not feel that way.

Also felt that there would be no need for further open space on the site as it is next to the recreation ground.

KIN013: Land to the west of recreational facilities, Inkpen Road

They thought the site could be split into 2 areas; as the northern part of the site is quite well related to the existing settlement, with the southern part of the site less well related.

Site is quite visible, particularly the southern part of the site. If any of the site had to be developed then the north eastern part of the site might be suitable.

Access to the site would be a significant issue. Inkpen Road is narrow, and the junction of the High Street and Wallingtons Road is a pinch point for traffic in the village with many cars parking along the roads. The developer has contacted the Parish Council regarding access to the site via the recreation ground. The Parish Council were not happy with this suggestion.

KIN014: Land to the west of Kintbury, Hungerford Road

They considered that the site would be inappropriate for development. No one would disagree with the landscape assessment of the site.

KIN016: Land at Deane, Inkpen Road

Landscape assessment for this site has not been done yet.

Access could be an issue as there are lots of junctions onto Inkpen Road near to the site. There are no pavements along the road at this point. Traffic from the site would be pushed through the village to get to the A4.

Felt that the site is quite remote and is the start of the countryside as you leave the village. Development of the site could begin to stretch development into the countryside. Feeling that the village stops before the site.

Perhaps part of the site could be considered, potentially a couple of dwellings along Barrymore Road. They thought this could be more favourable than anything along Inkpen Road.

General feeling that development of this site would be urbanising the rural area and new development would create visual harm to the surrounding character of the area.

General comments

The Parish Council felt that they have positively responded to developments at Hop Gardens, so feel that they have done their bit to provide housing.

The area of open space at the centre of the village (near to Hop Gardens) is protected by S106 and a covenant. Potential for designation as local green space through the SAD DPD's review of open space should the parish council want to pursue this (details of this will be sent to parish councils in due course, it does not form part of this consultation).

The road network is a primary concern; even junctions onto the A4 can be difficult.

They felt that the Settlement Boundary should stay the same, unless some areas designated for development.

WBC emphasised that development needs to be right for Kintbury; they are not just looking for easy / quick wins.

Affordable housing – there is a need within the village. Likely the Parish Council may look more favourably on development that includes affordable housing. (All

development on greenfield land will have to have a minimum 40% affordable housing on it).

**SHLAA Consultation Event – Lambourn
27 January 2014**

Present

Peter Cox	Lambourn Parish Council
Sue Cocker	Lambourn Parish Council
Sue Benn	Great Shefford Parish Council
Gareth Knass	Great Shefford Parish Council
Liz Alexander	West Berkshire Council
Paula Amorelli	West Berkshire Council
Laila Bassett	West Berkshire Council
Sarah Conlon	West Berkshire Council

Western area 'catch all' session (6 February 2014):

Peter Iveson	Lambourn Parish Council
Alistair Buckley	West Berkshire Council
Sarah Conlon	West Berkshire Council

Prior to the discussion of the sites, Lambourn Parish Council (LPC) outlined the consultation that they had recently undertaken with the community to get their feedback on the Lambourn SHLAA sites. The starting point was that there would be some future development in Lambourn. No development was not an option.

The consultation included a drop-in event which 100 people attended. A questionnaire was available to residents, and this was completed by 78 people. Residents were asked to rank the potentially developable sites in order of preference. Most responses accepted that there would be development. A summary is included at Appendix 4.

Site specific comments

LAM002a: Land at Meridian House and Stud

Access is the primary concern with this site. Access via Coppington Gardens would impact on Bockhampton Road and Station Road. There are no garages here so lots of on road parking. This effectively makes it a one way road. Extra traffic generation is of great concern. The roads are already well used.

There could possibly be access from Greenways, but this is an unsuitable road – it is a bridleway not an adopted road. The residents paid for tarmacing.

Concern about future development to the south of the site if LAM002a were to be developed as the land is raised and could have visual impacts.

Development could impact on drainage and run-off.

This site received the highest preference by respondents to the questionnaire (13% chose this site as their first choice and 19% as their second choice). The Parish Council are against the development of this site.

LPC noted that there is currently an application for six dwellings at Woodbury on the site of an existing garage block. Limited access to this site.

LAM003: Land between the River Lambourn and Bockhampton Road

LAM004: Land off Bockhampton Road

Both sites were assessed as currently undevelopable in the SHLAA. LPC are in agreement with this assessment. Both sites would have a landscape impact.

LAM005: Land adjoining Lynch Lane

LPC has various concerns with the site as does the local community, and these are primarily focused on drainage problems and the visual impact of development. If the site had to be developed, there would need to be significant landscaping / tree planting to integrate the site into the landscape.

The land is very wet and is in an area of groundwater emergence. It was queried if there is the possibility of having SuDS on the site, for example a pond. A groundwater solution is also needed. However, the River Lambourn is a Site of Special Scientific Interest (SSSI), and further concerns were raised about any drainage solutions having a detrimental impact upon this designation. LPC also commented that a buffer would be required between the SSSI and any development on the site. Following the session, LPC submitted information about flooding on the site which is discussed in the general comments section below. They acknowledged that at February 2014, there was standing water in the field and the ground appeared very wet.

The site promoter has suggested 160 dwellings on the site, whilst the SHLAA had suggested 60 (this takes into account a reduced developable area due to the constraints). The Parish asked if this was negotiable. WBC responded that when allocating sites, they would work with the developer.

The site is presently in agricultural use. Several questionnaire responses commented about the loss of this land. Other concerns were around increasing development between Lambourn and Upper Lambourn and the possibility of these two areas 'joining-up'.

There is access to the site (from Essex Place). Some questionnaire responses felt that this site was the most suitable in access terms. However, LPC did note that there is no formal footpath. They have been trying to designate one but there has been little support for this by Lambourn residents.

LPC advised that there is the possibility of Saxon remains on the site.

Of all of the potentially developable sites in Lambourn, this was the least favourite amongst questionnaire respondents (49%).

If this site were to come forward, there is a preference for ground level development with no townhouses.

LAM006: Land at Wantage Road and Northfields

LPC are in agreement with the Council's conclusions regarding the significant impact that any development on the site would have upon the landscape.

They queried what would happen if the site promoters submitted their own landscape assessment. West Berkshire Council (WBC) commented that this could be argued

during the Examination of the Site Allocations and Delivery Development Plan Document.

Loss of open space may result in flooding on site and elsewhere in Lambourn.

LAM007: Land between Folly Road, Rockfel Road / Bridleways and Stork House Drive

Concerns raised over access – Folly Road is unsuitable for the whole of the site – the road is narrow and is a horse route up to the gallops. The lower part of the site could be accessed from Rockfel Road. If only the frontage of Folly Road was developed for large houses, then access from Folly Road might be acceptable.

Development could result in increased run-off into Lambourn village. There are already fragile water mains – the 10” main on Folly Road has burst 3 times in the last 6 months.

The future of the racing yard adjacent to the site was questioned – the owners have put in access from Folly Road through to the yard. The yard is still in use, but has scaled down over the years. LPC are concerned this development would mean the loss of a racing yard.

Development on the northern part of the site would be visually prominent. If the plot arrangements from the opposite side of the road are replicated, ie. the ribbon development along Folly Road, development could be acceptable.

The possibility of having two separate sites was also mentioned, ie. take out the strip of land immediately behind the racing yard which has been identified as not developable within the Landscape Assessment.

LPC thought that ownership of the site might prove problematic to any development on the site coming forward.

The overall conclusion was that if development is needed, then development of the site might be a possibility if constraints are taken into account and if considered as two separate sites. The site was the first choice of 27% of questionnaire respondents and the second choice of 21%.

LAM009: Land east of Hungerford Hill

Access and landscape impact were the main concerns with this site.

Access from Hungerford Hill is considered to be dangerous. Other access is from Greenways but this is difficult – very narrow point by the school. Possible access if land purchased from off Greenways.

Site slopes – visual impact at the entrance to the village. It would be difficult to screen any development. The character of the village would be affected by development.

Drainage issues – tarmac will exacerbate drainage issues. Concerns as to where the displaced water will go.

6% of respondents put this site as their first choice, and 10% as a second choice.

LAM013: Windsor House Paddocks

Drainage and flooding are the main concerns for this site. The site floods and is part of the natural flood protection for Lambourn village. There was once an open gully on the land but that has been filled in. The site is bowl shaped and a few years ago there was 4ft of standing water.

Whilst there are engineering solutions to prevent new dwellings from flooding, LPC has concerns that development would result in flooding elsewhere in the village. There has been recent runoff into the High Street, and development here could exacerbate this. Following the session, LPC submitted information about flooding on the site which is discussed in the general comments section below. They acknowledged that between 8 and 14 February 2014, there was a sudden rise in the water level which seems to have been caused by groundwater flooding but augmented by surface water flooding. The Parish Council's allotments border the site to the southwest. Increasingly frequent flooding events, caused by both ground and surface water, especially a very large flood in July 2007 caused LPC and the Allotment Society in 2008 to commission consultants APAS to produce a report on causes and solutions. The report and the LPC's information on fluvial flooding are included in Appendices 5 and 6.

WBC (Highways Team) have been looking at solutions – a possibility is putting in a bund by the allotments to the south of the site. LPC are unsure as to where the water would be redirected to.

LPC noted that the site is a significant green area in Lambourn and a feature of the village. However a few respondents to the questionnaire did comment that this site has the least visual impact of all of the sites. WBC commented that sites which were submitted post 2011 (such as this site) had not yet been subject to a landscape assessment.

Several respondents commented that the site has good access.

13% of respondents put this site as their first choice, and 19% as a second choice.

LAM014: Upshire House

LPC in agreement with WBC's conclusion that the site is not currently developable. Only 6% of respondents thought this was a good site.

Previous planning application refused for site.

The site is a long way outside of the settlement.

General comments

LPC have estimated that there will be 50-100 new homes in Lambourn up to 2016 – WBC responded that it is difficult to be precise about numbers at this point in time.

It was queried what would happen if site availability cannot be confirmed? WBC contacted all of the promoters/landowners who submitted sites in 2011 if the site was still available. In several cases, there has been no response. WBC will need to consider removing sites. At this stage, they have been kept in the assessment.

Lack of infrastructure and services in Lambourn. Could the surgery and schools cope with additional growth? There is already a lack of bus services to the secondary school. Library opening hours are being cut. In this context, Lambourn is looking at a shrinking of public services.

There is a complex relation in Lambourn between sewage, surface water and groundwater in winter when the aquifers fill up.

The commercial viability of all of the sites was questioned given the varying constraints on a number of houses likely to be permitted, the work needed to prepare the sites and the sizes of the sites.

LPC provided the Council with a copy of the conclusions from the public consultation held by the Parish Council, along with a petition from the community seeking further public consultation. It was explained by WBC to LPC that further public consultation will take place should any sites be allocated through the Local Plan process.

LPC submitted further information about flooding of two sites – LAM005 and LAM013, in addition to a map showing the extent of groundwater flooding to both sites in February 2014.

The Parish highlighted that parishioners are very concerned that flooding could again affect the centre of the village.

**SHLAA Consultation Event – Aldermaston, Midgham and Woolhampton
10 February 2014**

Present

Dave Shirt	Aldermaston Parish Council
Clive Vare	Aldermaston Parish Council
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council
Caroline Peddie	West Berkshire Council

Apologies

Hilary Cole	Exec Portfolio – Planning
Irene Neill	Aldermaston Ward Member

At the start of the meeting, West Berkshire Council (WBC) outlined that SHLAA sites ALD001 and ALD002 had been assessed as not currently developable because of their location within AWE's inner land use planning consultation zone. Site ALD003 was an allocation in the Local Plan and development has now been completed.

Aldermaston Parish Council (APC) questioned the classification of Aldermaston as a rural service village and felt it should be reduced in the hierarchy because the analysis incorrectly assessed the availability of facilities. They also pointed out that Aldermaston village represents only 20% of the parish. WBC clarified that Aldermaston is defined as a service village in the adopted Core Strategy so cannot be changed. Sites such as Aldermaston Wharf will be considered in the review of settlement boundaries.

APC felt that Aldermaston Wharf offers more potential for housing sites than Aldermaston Village. WBC explained that at the moment the SHLAA is only considering sites that are within and adjacent to the settlements within the settlement hierarchy. (Aldermaston Wharf is not included within the hierarchy). *WBC to send APC maps of the rural sites in Aldermaston that were submitted for the SHLAA.*

APC want more affordable housing in the village for local people. They are working with the Wasing Estate to find a rural exception site that could accommodate 8-10 dwellings. APC feel that the land north of the primary school and west of SHLAA site ALD001 is a possibility. They are hoping that the WBC Planning Dept will look at sites on a case by case basis when considering DEPZ restrictions.

Site specific comments

ALD001: White Tower Nursery

Parish Council prefer this site to ALD002, however they have concerns that any development here would set a precedent, particularly the allotment field opposite. WBC clarified that the site had been assessed as not currently developable. It is noted that part of this site is already classified as brownfield. Should the site ever come forward, APC would want a car park built for the recreation ground on this site.

ALD002: Land at Foresters Farm

The site is not currently developable.

APC would object if this site ever came forward. Development would spoil views. The village is linear in nature and development on this site would fail to maintain this. However a small portion of the site (alongside Wasing Lane) is still a possibility as a rural exception site. They would like a car park behind the parish hall should the site ever be developed.

There is presently standing water on part of this site.

ALD003: Land at Fisherman's Lane

The site has planning permission and development is now complete.

The scale of development here was not particularly suited to the service village classification of Aldermaston, as it increased the size of the village by more than 25%. An incremental amount of development would have been more suitable.

General comments

Flooding

The area to the north and east of ALD001 flooded recently. It was typically up to 18 inches. APC are unsure of the extent of flooding immediately to the east of ALD003, though that area has a high water table. The worst of the flooding was to the north and east of ALD001 where the depths were up to 2-3 feet.

The Parish Council are unaware of any premises being flooded, though there was one that came very close and had to use sandbags and dig a trench for their protection.

The flooding differed from the flooding in July 2007, when I believe the cause was flash flooding. Water drained into the Village from the south and west, and the drainage infrastructure was unable to cope. Thanks to remedial work, principally by WBC, the infrastructure was able to cope with the steady, but less heavy, rain in February 2014.

**SHLAA Consultation Event – Burghfield
10 February 2014**

Present

Paul Lawrence	Burghfield Parish Council
Amy Trueman	Burghfield Parish Council
Royce Longton	Ward Member for Burghfield
Hew Jones	Sulhamstead Parish Council
Gary Newell	Sulhamstead Parish Council
Richard Smith	Sulhamstead Parish Council
Keith Chopping	Ward Member for Sulhamstead
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council

Eastern area 'catch all' session: 11 February 2014:

Margaret Baxter	Sulhamstead Parish Council
Rosemary Sanders-Rose	Sulhamstead Parish Council
Elizabeth Shaw-Brookman	Sulhamstead Parish Council
Teresa Sosna	Sulhamstead Parish Council
Ivan Wise	Sulhamstead Parish Council
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council

Site specific comments

Burghfield Common

BUR003: Clayhill Copse/ BUR009: Land at Clayhill

The site is poorly related to the village and covered with trees. Burghfield Parish Council (BPC) agreed with the not currently developable assessment.

BUR015: Land adjoining Pondhouse Farm, Clayhill Road

This site is one of the preferred sites for development, should development be needed. BPC suggest that the site would be suitable for about 50 dwellings.

BUR002 and 2A: Land to the rear of Hollies Nursing Home / BUR016: Land opposite 40 Lamden Way / BUR004: Land opposite 44 Lamden Way

Access to the site could be an issue. Waste water and flooding are potential issues for this site.

The site is reasonably well screened. BPC would rather see the smaller sites (BUR016, 004 and 002A) developed than the whole site.

BUR005: Land between Reading Road and Gully Copse

Access from a Hill, with some blind corners. This site would extend the village eastwards.

BUR008: Land adjoining Man's Hill

Access from Man's Hill is not great; the roads would need to be upgraded. This site would extend Burghfield eastwards. Development on the site would be highly visible.

BPC would not like to see development at either BUR005 or BUR008. This view was echoed by Sulhamstead Parish Council (SPC) at the meeting on 11 February.

BUR006: Land adjacent Bolt Hole, Hollybush Lane / BUR 007: Land at Firlands / BUR011: Benhams Farm, Hollybush Lane

SPC have carried out a residents survey and of the 60% of respondents, 95% said that they did not want this site to be developed.

Traffic generation from the site would be an issue on Hollybush Lane. There is no natural boundary to the west of the site to prevent development spreading beyond the current proposed site.

There are surface water and drainage issues on the site, and any development could lead to flooding issues elsewhere.

Development here would impact on four parishes and encroach on the space between parishes.

The following comments were made by Sulhamstead Parish Council at the eastern area catch all session on 11 February 2014 in respect of sites BUR006 and BUR007.

SPC is strongly opposed to any development of sites BUR006 and BUR007. Concerns that because of the planning history to site BUR007, development is inevitable. West Berkshire Council (WBC) clarified that development will not necessarily take place, and that the site will be assessed in the same way as all the others. The site will form part of the basket of sites, and the most acceptable will be allocated. All technical issues will be considered when selecting the sites to be allocated such as flooding, transport/highways, etc.

WBC highlighted that the promoters of the Firlands site had misinterpreted the Core Strategy and put forward plans for a district centre. The Core Strategy in policy ADPP6 (East Kennet Valley) actually states that opportunities should be sought for a more distinct centre offering shops and services in Burghfield Common. Planning Policy had put in objections to the Firlands planning application.

The scale of development suggested by the site promoters for the Firlands site is greater than what is needed for the East Kennet Valley spatial area.

Traffic generation from the site and the capacity of the existing road network a concern, particularly on Hollybush Lane. Reading Road was also cited as being busy even though it is not a main road. Altering the roads in Burghfield Common, for example widening Hollybush Lane to allow greater capacity, would change the character of the village.

Flooding was also raised as an issue. Development would increase run-off.

Loss of trees on the site would harm the character of the area.

General comments from the eastern area 'catch all' session (11 February)

SPC queried the area that the 270 housing requirement covered. It was clarified that this was for the whole of the East Kennet Valley which includes the settlements of Aldermaston, Burghfield Common, Mortimer and Woolhampton. There is no set housing requirement per settlement, and the amount of development depends on factors such as facilities and services, as well as the availability of suitable development opportunities.

Burghfield Common is very well served with facilities/services and these are well supported – it is possible to live in the area and not go anywhere else. The comment in the Burghfield Parish Plan regarding there not being enough facilities has been removed from the plan.

The new Tesco has resulted in parking issues (on Hollybush Lane) and has increased congestion on roads. The problem is exacerbated when children are dropped off at the Scout Hut. Concern by SPC that there will be accidents. Any queries should be directed to the Council's Road Safety team:
roadsafety@westberks.gov.uk.

The future of the Gypsy and Traveller site at Four Houses Corner was questioned. There are 8/9 years left on the lease. WBC highlighted that a needs assessment has shown that there is an undersupply of Gypsy and Traveller sites in the district. All local planning authorities have to demonstrate a 5 year supply of sites which cannot be done at present. We are therefore vulnerable to speculative applications.

**SHLAA Consultation Event – Mortimer
10 February 2014**

Present

Mike Dennett	Stratfield Mortimer Parish Council
Pat Wingfield	Stratfield Mortimer Parish Council
Geoff Mayes	Ward Member for Stratfield Mortimer
Liz Alexander	West Berkshire Council
Laila Bassett	West Berkshire Council
Rachael Lancaster	West Berkshire Council

The Parish Council has looked at the sites as part of the development of their Neighbourhood Plan. For sustainability reasons they would like to see sites near to the centre of the village than extending the periphery of the village, if they need to have any sites at all.

There is a feeling that none of the site should be developed to their maximum potential as this would put unnecessary strain on the local infrastructure.

There is a general need within the village for additional car parking (station, schools etc.)

Site specific comments

MOR001: Land at Kiln Lane

This site is seen as extending the boundary of Mortimer. Access to the site is not good, and cannot see how access to the site could be gained except via The Street, which would be on a bend.

There are drainage issues on the site as a drain runs through the site to the brook south of the site.

MOR006: Land to the south of St. John's Church of England School, Victoria Road

This site is seen as the most logical site for the village. Access to the site is ok. Tower House, The Street immediately to the north of the site have been demolished and there is planning permission to replace them with 4 new detached dwellings (applicant is T.A. Fisher).

The proposed 170 dwellings is considered to many for the site. Traffic is not seen as a huge issue, as long as a smaller number of houses were proposed.

Access to the railway station is not great.

MOR007: Land behind Six Acre Cottage, Drury Lane

Parish Council agreed that this site is poorly related to the village and therefore, agree with the not currently developable assessment.

MOR005: Land adjoining West End Road

This site would extend the village to the west. Not considered to be well related to the main area of the village.

MOR002: Land adjacent to College Place

Parish Council agreed with the not currently developable assessment of the site.

The site description which describes MOR002 as being available for informal recreation is incorrect. There is no public right of access apart from the existing footpath.

MOR008: Land at north east corner of Spring Lane

The site is located on the edge of the Common. Flooding occurred here in 2007 as water flows down Spring Lane. Part of the EA's drainage works are proposed for this location.

General comments

Mortimer has developed through infill over the last few years, through the development of large back gardens.

The parish council accept that Mortimer needs to develop and therefore acknowledge that some housing is needed.

Strawberry Fields (120 homes) has integrated quite well into the village, although the parish council would like any new development to be at a lower density than this development.

The Neighbourhood development plan is aiming to allocate sites.

Outcomes

Table 1 indicates the preferred sites as indicated by the parish and town councils at the SHLAA consultation events. Sites which were assessed as not potentially developable despite the parish council stating they are preferable are not included in Table 1.

Table 1: Preferred sites:

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
Bradfield Southend	Bradfield	AONB	BRS002	Corner of Cock Lane and South End Road	4	Potentially developable	
Bradfield Southend	Bradfield	AONB	BRS004	Land off Stretton Close	12	Potentially developable	
Chieveley	Chieveley	AONB	CHI021	Land at Bardown	75	Deliverable	
Cold Ash	Cold Ash	AONB	COL004	Liss, Cold Ash Hill, Cold Ash	27	Potentially developable	
Compton	Compton	AONB	COM004	Pirbright Institute Site	140	Potentially developable	
Great Shefford	Great Shefford	AONB	GSH001	Land west of Spring Meadows	16	Potentially developable	Noted at the consultation event that the site would only be suitable if constraints can be overcome
Hermitage	Hermitage	AONB	HER001/004	Land off Charlotte Close / Land south east of The Old Farmhouse	30	Potentially developable	Noted at the consultation event that a few homes off Charlotte Close could be considered

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
Hermitage	Chieveley / Hermitage	AONB	HER009	North of Primary School, Hampstead Norreys Road	28	Potentially developable	Noted at the consultation event that the site is the most acceptable to the Parish Council
Hungerford	Hungerford	AONB	HUN001	Rear of Westbrook Farmhouse, Smitham Bridge Road, Hungerford	26	Potentially developable	Noted at the consultation event that the site is the most logical extension to the settlement
Hungerford	Hungerford	AONB	HUN006	Land at Eddington, Hungerford	9	Potentially developable	
Kintbury	Kintbury	AONB	KIN013	Land to the west of recreational facilities, Inkpen Road	26	Potentially developable	Noted at the consultation event that only the northern part of the site only
Kintbury	Kintbury	AONB	KIN006/007/009/015	Land to the east of Layland Green	58	Potentially developable	Noted at the consultation event that that some infill development acceptable, but not a large scale development
Lambourn	Lambourn	AONB	LAM007	Land	24	Potentially	Noted at the

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
				between Folly Road, Rockfel Road / Bridleways and Stork House Drive		developable	consultation event that if development needed, then development a possibility if the site is subdivided into two sites
Pangbourne	Pangbourne	AONB	PAN002	Land north of Pangbourne Hill and west of River View Road	48	Potentially developable	Noted at the consultation event that a small amount of development could be acceptable but not whole site
Burghfield Common	Burghfield	EKV	BUR002A	Land adjacent to Primrose Croft, Reading Road	26	Potentially developable	
Burghfield Common	Burghfield	EKV	BUR004	Land opposite 44 Lamden Way, Burghfield Common	10	Potentially developable	
Burghfield Common	Burghfield	EKV	BUR015	Land adjoining Pondhouse	287	Potentially developable	

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
				Farm, Clayhill Road, Burghfield Common			
Mortimer		EKV	MOR006	Land to the south of St John's Church of England School, Victoria Road	177	Potentially developable	Noted at the consultation event that 177 is too many for the site
Tilehurst	Tilehurst	EUA	EUA001	Dacre, New Lane Hill, Tilehurst	11	Developable	
EUA	Tilehurst	EUA	EUA005	Land at Calcot Golf Course, Calcot Park, Tilehurst	12	Potentially developable	
Calcot	Tilehurst	EUA	EUA011	Land north east of Calcot Park Golf Club, Calcot Park, Calcot	45	Potentially developable	
Calcot	Tilehurst	EUA	EUA11A	Land north east of Calcot Park	5	Potentially developable	

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
				Golf Club, Calcot Park, Calcot			
Calcot	Tilehurst	EUA	EUA016	Murdochs Diner, Bath Road, Calcot	5	Developable	
EUA	Tilehurst	EUA	EUA024	The Colnade, Overdown Road, Tilehurst	10	Developable	
Calcot	Holybrook	EUA	EUA037	Former Horncastle Ford Site, Bath Road, Calcot	19	Developable	Noted at the consultation event that potential for apartments
Newbury (South)	Newbury	Newbury / Thatcham	NEW008	Land adjoining Mencap Respite Centre, Pinchington Lane	15	Potentially developable	
Newbury	Newbury	Newbury / Thatcham	NEW023	Elizabeth House, West Street	24	Deliverable	Noted at the consultation event that that the general principle of development ok
Newbury	Newbury	Newbury	NEW024	Land at St	24	Potentially	

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
(South)		/ Thatcham		Johns Garage, Newtown Road		developable	
Newbury	Shaw cum Donnington	Newbury / Thatcham	NEW031a and b	Land at Shaw (west of A339)	549	Potentially developable	Noted at the consultation event that the site should be considered post 2026 as a strategic site
Newbury	Speen	Newbury / Thatcham	NEW042	Land at Bath Road, Speen	104	Potentially developable	
Newbury	Cold Ash	Newbury / Thatcham	NEW046	Quantel Ltd, 31 Turnpike Road	54	Potentially developable	
Newbury	Newbury	Newbury / Thatcham	NEW073	BT, Bear Lane	20	Potentially developable	
Newbury (South)	Newbury	Newbury / Thatcham	NEW082	Sterling Industrial Estate, Kings Road	46	Potentially developable	
Newbury	Newbury	Newbury / Thatcham	NEW087	Hutton Close	86	Developable	
Cold Ash	Cold Ash	Newbury / Thatcham	COL004	Liss, Cold Ash Hill	27	Potentially developable	Noted at the consultation event that this was the least worst site in Cold Ash

Settlement	Parish	Spatial Area	Site Ref	Site Address	Development Potential	SHLAA Assessment	Comments
Thatcham	Newbury	Newbury / Thatcham	THA013	20-26 Chapel Street	10	Deliverable	
Thatcham	Thatcham	Newbury / Thatcham	THA028	Land north of Floral Way and east of Harts Hill Road	103	Potentially developable	
Thatcham	Newbury	Newbury / Thatcham	THA029	Former deport at Pound Lane	21	Deliverable	
Thatcham	Newbury	Newbury / Thatcham	THA033	99 Station Road and Land at Hewdens	14	Deliverable	
Thatcham	Newbury	Newbury / Thatcham	THA034	1-8 Clerewater Place, Lower Way	11	Developable	

Appendices

- Appendix 1 Shaw cum Donnington flooding photos (February 2014)
- Appendix 2 Cold Ash additional information
- Appendix 3 Compton flooding photos (February 2014)
- Appendix 4 Lambourn Parish Council Public Consultation on the SHLAA– summary of responses
- Appendix 5 Lambourn Parish Council Fluvial Flooding Report
- Appendix 6 Lambourn Parish Council Allotment Flooding Report
- Appendix 7 Chieveley Parish Council additional comments

Appendix 1: Shaw cum Donnington Parish Council photos of flooding
(February 2014)

Flooding in Shaw cum Donnington Parish at February 2014

NEW001:

Figure 1: Flooding High Field Farm Road Surface Water 450mm



Figure 2: Flooding Long Lane near High Field Road 200mm deep surface water



NEW010:

Figure 3: High Field Farm Flooding surface water 200mm deep



North of NEW031 (A):

Figure 4: Surface water flooding at Whitfield Farm (200mm)



Figure 5: Donnington Valley Golf Course, Oxford Road surface water flooding (200mm)



NEW031 (B):

Figure 6: Flooding at public footpath west of A339 near Vodafone (300mm)



Figure 7: Flooding at public footpath east of a339 near Vodafone surface water runoff 350mm



Figure 8: Vodafone Field Flooding Surface Water run off (300mm)



NEW087:

Figure 9: Flooding on Shaw Road near Mill House (River Burst Banks) 300mm



Appendix 2: Cold Ash Parish Council Additional Information

Good morning/afternoon

Let me first introduce the Cold Ash Team. I am Geoff Findlay Chairman of the Parish Council. First my Parish Councillors: Cllrs Mike Munro and Linda Verner; Jim White is a representative of the Cold Ash Community Partnership who amongst other things produce and promote our Vision Documentation and lastly but not least our District Councillor Garth Simpson.

The Village of Cold Ash is *defined as a place* by:

- its *geographical location and underlying geological structure,*
- its *history over the past 200 years and its development as a settlement during that period,*
- And finally, the Parish is defined by its rural character.

In accordance with the National Planning Policy Framework our stance on development, and the evaluation of alternative proposals, is governed by the principles of sustainability, as defined in the NPPF, and the **preservation and enhancement of our natural environment** including improving biodiversity.

PRESERVATION

The concept of **Preservation**, and avoiding inappropriate development which could increase the risk to the Village is key, particularly when we are faced with climate change and the greater risk of further flooding. (Para 100 NPPF
Inappropriate development in areas at risk from flooding should be avoided)

While *parts* of the Village are *included within the North Wessex Downs Area of Outstanding Natural Beauty (ANOB), adjoining areas* of the Parish have been *denied that most important protection by an arbitrary line on the map.* Those areas in the *more southerly part of the settlement nevertheless form a "buffer zone" where we must ensure that development adheres largely to AONB rules* ^{and the landscape has a highly enhanced character} if the intrinsic value of that unique chalk landscape is not to be masked and over run. Even the more relaxed planning requirements of National Planning Policy Framework state that "GREAT weight should be given to conserving landscape and scenic beauty in areas which have the highest status of protection" (para 114/115)

Highly Enhanced Character

Much of Cold Ash carries the hallmark of classic ribbon development settlement with extensive views between individual properties into the wooded areas and open countryside of the adjacent or more distant ANOB. On the micro scale that ambience creates a unique street scene. On the macro scale the preservation of "gap land" between local settlements ~~were~~ *was* emphasized in the last Local Plan, and in our own development statements, as being crucial to maintaining the sense of place for Cold Ash. Preserving the individuality of settlements and preventing the creeping edge of urbanisation from Thatcham and Newbury spreading along the commuter routes through the Village as links are forged with the motorway net to the north is again stressed at para 79-80 in the NPPF.

FLOODING

Within Cold Ash the pattern of historic development has been governed by the strong scarp slope running east to west along the Ridge, one of the highest points in the local area. That east/west ridge controls the flow of drainage southward to the flood plains of the Kennet Valley with ribbon development along the higher north/south spurs running down from the Ridge to the Thatcham and Newbury,

We do not see the absence of flooding as a 'plus' factor in defining the suitability of sites for development. Rather we see FLOOD RISK as an **exclusion** factor. The floods of 2007 clearly emphasized the dangers of impeding this north/south natural drainage by creating settlements or transport routes across "the spine" of the countryside. The memories of the damage done, and ~~the~~ *the* distress caused, are still very real. Funding for repairs and flood alleviation is expensive and scarce. I am pleased to say that work started in one area of the Parish a couple of days ago on a scheme to protect Little Copse and parts of north Thatcham from the historic threat from flooding. Design work is also being undertaken by the Environment Agency for similar flood alleviation works north of Henwick Creek and Tull Way to protect the south of the Parish and houses in north Thatcham which are in danger of flash floods from the steep open hillsides in Cold Ash. Care must be taken to ensure that future developments do not compromise these flood prevention solutions.

Risks to the natural environment from the over-development of housing both in the Village and on its immediate boundaries are very real. The present road network in Cold Ash is based largely on the original farm tracks linking settlements. These tracks have not been remade or significantly developed in the intervening years and most commuter roads are below modern standards in terms of both of both ^{road} width and construction. Footways are often absent or are too narrow to allow a Mum with children to use the route safely. The roads are better suited to the horse and trap which is still seen regularly at the quieter times of day.

TRAFFIC – LOCAL AND COMMUTER

The marked increase in traffic through the Village in the past 15 years has been hugely detrimental to the quality of life of residents. That increase has been swelled by house building in the Village, a steady reduction in the number of bus services (often subsidized) through the Village, and an increase in the roll at the Village primary schools, both of which have traditionally had denominational aided status and drawn pupils from the wider area. These population increases have not been matched by a sustainable development of 'walkable' local services and there has been a gradual increase of local traffic within the village.

More importantly though, there has also been a marked rise in ^{to} twice daily A4/M4 commuter traffic through the Village linking the A4 and M4 arterial routes. Although the new Tull Way/Floral road network improved east west traffic movement in north Thatcham, it also 'dragged' commuter traffic into the area. Cold Ash Hill and Hermitage Road was soon identified as a quicker route between the M4 and the A4 than Newbury and the 'famed' Robin Hood roundabout. The result, (pause) Cold Ash has peak rush hour traffic loadings of some 500 vehicles an hour on Cold Ash Hill/Hermitage Road.

Whereas the introduction of a 'traffic restricting' system of extended chicanes through the Village has largely been successful in enforcing the 7.5 tonne weight limit and preserving road-side houses and roads surfaces from damage by HGVs, it has impeded the flow of other vehicles using the Village as a 'rat run' thereby creating frequent traffic hold-ups particularly during the rush hour. Even a small rush hour accident can now lead to hold ups, delays and

frayed tempers, as the daily wave of traffic passes through the Village. Further, in an effort to keep the traffic moving we are now covered from north to south by a plethora of yellow lines, 'no waiting' signs and illuminated traffic advisory information..

Our priorities:

- preserve the essential rural character of the Village,
- mitigate the adverse effects of further flooding by controlling the flash flow of heavy rain and avoid building on known watercourses and water-storage and drainage areas,
- ensure that additional development in the area does not lead to further increases in traffic through the Village.

DEVELOPMENT CONSIDERATIONS FOR THE PARISH OF COLD ASH AND ITS VILLAGES AND SETTLEMENTS

This paper outlines the material considerations which need to be taken into account in the development planning for Cold Ash over the next 12 years timeframe. It draws on the Village Design Statement, Parish Plan and associated questionnaires, census 2001/2011 data, WBC Core Strategy, the Environment Agency SFRA and the NPPF.

The three material considerations are:

- a) the characteristics of the Parish, encompassing:-
 - its rural heritage; historic landscape character; wildlife, lanes, copses and old commons
 - the historical development of the built environment
 - the community: its population trends and infrastructure
 - transport modes; dependencies on Thatcham and Newbury
 - flood risk within and across Parish boundaries
 - sustainability
- b) the guidelines for development and Parish needs and aspirations
- c) an initial view of sites identified in the 2013 SHLAA

PARISH CHARACTERISTICS

A. RURAL CHARACTER

The distinctive characteristics of Cold Ash Parish are determined in large part by the topography and geology contained within it. The hills, streams, lanes, old woodlands and pastures together with the ancient common form an environment of great beauty and variety.

The historic development of the area derives from a significant number of farms on the slopes of the hills leading to the common, together with incursions of small groups of dwellings into the common itself. This rural heritage has been maintained, with the AONB encompassing much of the common, and the farms with their historic field patterns, including examples of pre-18thC fields, forming the buffer zone between the AONB and the urban areas of Thatcham and Newbury..

The current road system is based heavily on the rural lanes of 200 years ago with little alteration to meet modern traffic needs. Most lanes are narrow, often hilly and winding, with extensive tree canopies, high banks and exposed tree roots. All the gateways to the Parish are rural in nature.

There is an extensive network of footpaths, often along field boundaries, following ancient rights of way connecting the hamlets and villages with many of the fields still being contained by 18th C hedgerows and trees. The many wildlife sites and the SSSI are surrounded by farmland.

The residents in all parts of the Parish have expressed strong support in multiple surveys for the environmental values of the Parish

- the rural environment
- the access to green spaces and footpaths
- the rich biodiversity and scenic beauty
- the historic pattern of the development of the built environment

Together these provide a strong sense of place, demonstrating the “rural character of the Parish and recognising the intrinsic character and beauty of the countryside”

Overall, whether viewed from the top or bottom of the hills in the Parish the overwhelming sense is of a rural tranquil area.

B. HISTORICAL DEVELOPMENT PATTERN OF THE BUILT ENVIRONMENT

As can be seen from historical maps, prior to 1939 most development comprised single detached properties or small discrete collections of cottages for rural workers. The majority of building took place along existing rural lanes and farm tracks carrying the hallmark of classic ribbon development. This pattern of growth has since been followed in the villages, with small, time stamped developments being built on and off the lanes and roads,

Contrasting with the gradual evolution of the two villages and in total comprising the Parish, are four larger developments on the southern periphery of the Parish, (Manor Park, Florence Gardens, Billington Way, Southend). These are small to medium developments adjacent to the northern borders of Thatcham and Newbury. They are typical housing developments of their periods.

Modern houses have been built along side roads and in small groups reflecting the architectural style of the relevant periods, as in Sewell Close, The Rise, Hatchgate Close, and Strouds Meadow. The longer established parts of the two villages have retained a low density of housing; small modern developments are of medium density and there has been some higher density replacement housing on single plots. Only one major development of over 100 houses has been built in the Parish, Manor Park (234).

Areas such as Fishers Lane, Bucklebury Alley, the lower part of Ashmore Green Road and Stoney Lane have retained much of their original look, having grass verges, large trees and hedges, attractive tree canopies, and no pavements. Any houses are set well back. Otherwise, the lanes are flanked by fields or woods. The replacement of single bungalows by higher density new housing on Cold Ash Hill is altering the visual aspect of the southern part of the village

Over the census period the Parish has seen a growth of 189 dwellings (1177 to 1366), i.e.15%. This housing growth is 23% of all housing growth in Service Villages in the period. Combined with Hermitage, the housing growth has been 60% of total Service Village growth, which has in turn driven traffic growth during this period.

The housing mix has remained fairly constant over this period, broadly comprising 65% detached houses or bungalows, 25% semi detached and 8% terraced properties. The provision of small family homes and accommodation for the elderly remains a Parish need.

C. COMMUNITY: POPULATION TRENDS & INFRASTRUCTURE

At 2011, the population stood at 4063 of which 566 were resident in communal establishments. Cold Ash has absorbed a 14.5 % population growth, within which the 65+ age band has grown at 22%, while the 20 – 44 band has slightly decreased. In combination with the adjacent parishes and wards of Thatcham, Clay Hill, Chieveley, and Bucklebury the population growth has equated to 51% of the total West Berks growth (4,800 out of 9,300)

Commercial facilities across the Parish have not matched the growth in population over the last 20 – 30 years. Two garages and two shops have closed, increasing the residents' dependence on Thatcham and Newbury.

Communal facilities are very limited for the size of the population, and are heavily used.

The Parish is bounded by significant traffic carrying roads. To the south and south-east are Heath Lane, Bowling Green Road and Tull Way forming part of the Thatcham Northern Relief Road running parallel to the A4; to the south-west is Kiln Road/Turnpike; to the west Long Lane. Traffic flows on the Thatcham Northern Relief Road have increased substantially since it opened, with typically 80,000 vehicle movements per week on this southern edge of the Parish.

All the cross Parish routes are used to access and/or connect the M4, (Jcts12 &13).and the A4. The increase in the population growth in and around the Parish has added to the problem

of congestion in the rush hours on these routes and traffic volumes have increased through the village due to rat- running between these points throughout the day

The principal cross parish route is over the north-south axis, incorporating Cold Ash Hill and Hermitage Road, where a primary school is situated, and carries 5,500-6,000 vehicle movements per day. This route is predominantly a 30 mph zone with traffic calming measures on Hermitage Road in the form of chicanes, and speeding devices on Cold Ash Hill and The Ridge. Speeding in off peak periods is an increasing problem especially on Cold Ash Hill in both directions.

Additionally supplementary east-west axes exist, embracing Stoney Lane, Ashmore Green Road, Fishers Lane and The Ridge. Access to Newbury is poor from Stoney Lane due to traffic conditions on Kiln Road, Shaw Road and the A339. Access times vary between 15 and 45 minutes.

Five lanes in Cold Ash parish are notable for their tree canopies: Ashmore Green Road, Stoney Lane, Fishers Lane, The Ridge and Bucklebury Alley. These lanes are an important leisure resource, much used by walkers and horse riders and are adopted farm tracks, light in terms of paving depth and varying in width from <2.8m to 7.0m. Three of them are deeply sunken. The lanes provide access to Thatcham and Newbury for the parish and as a conduit for traffic arising from the villages to the north east and west in the AONB. The signs of abuse are extensive, in terms of: gouged banks at pinch/informal passing points, damaged tree boles, exposed roots and smashed branches. Traffic accidents are rarely reported.

A parish study in 2011 of Ashmore Green Road, Fishers Lane and Stoney Lane revealed 103 mature trees, 58% of them oaks, to be suffering from damage and at risk. Even the much vaunted beech trees at the north of Ashmore Green Road are vulnerable, owing to the degree of soil erosion.

D. TRANSPORT MODES

As a whole the Parish depends on Thatcham and Newbury for the bulk of residents' services and shopping. Car usage is very high and has remained so in all aspects of individuals' lives. Peak time traffic causes congestion on the principal through routes.

Across the Parish 75% of respondents in work use their cars for business and/or transport to work, 90% for leisure, 86% for weekly shopping (29% Thatcham, 65% Newbury/retail parks) and 88% for access to health services. 56% of children are driven to school, while 25% walk.

Public bus services are used by only 6% of residents as the schedules and routes do not match work locations or serve the local station. There is significant use of the train for travel to Reading and central London.

E. FLOOD RISKS WITHIN AND ACROSS PARISH BOUNDARIES

Flooding, from both pluvial and surface water run-off is a major concern to residents. All areas of the Parish were affected by the July 2007 floods and some areas have been flooded again since then. Whilst the greatest number of properties affected were on the lower slopes of the escarpment, at the foot of Cold Ash Hill, Ashmore Green Road, Florence Gardens and in Manor Park, properties were also flooded by the recreation ground, at the top of the village, on the slopes of Cold Ash Hill and at isolated points on historical drainage routes. It is also apparent that sites flooded where multiple new properties had replaced single houses and bungalows due to loss of permeable land and the lack of mitigating drainage works.

The villages occupy a significant part of the northern catchment above Thatcham (where 1100 houses were flooded) and eastern Newbury. This catchment comprises "predominantly impermeable clay giving low permeability but a quick response time in terms of water run-off and overland flows". The "land falls steeply from the top of the watershed (The Ridge)", dropping 70m in less than one kilometre. Land use changes in the last 40 years have added

to the problem: “fields have been enlarged, converted from pasture to arable with a loss of hedgerows and ditches, resulting in a reduced capacity to hold back water” Combined with climate change predictions of more frequent and heavier rainfall events, enacting plans and policies to mitigate these effects is essential for villagers and the wider Parish.

Additionally sewer capacity issues at the north end of Northfield Road are exacerbated in any period of very high rainfall.

In the 2008 survey, 93% of responders declared that they were opposed to building on land either subject to flooding or that had contributed to flooding. Since “ increased development will result in greater impermeable areas and hence larger volumes of surface water runoff “. Ensuring needed development is neutral or will actually reduce water run-off will be a community challenge.

Flood prevention measures have been slow in being brought into effect despite the adoption of the Thatcham SWMP by WBC and EA in 2010. At this time only one of the nine surface water retention basins have received funding. The lack of committed funding for the remaining eight ponds makes any further reduction in permeable land to the north of Thatcham most undesirable.

For the area at the south end of Stoney Lane, especially in and around Manor Park, no additional flood protection measures are planned despite water levels in the 2007 flood being within one centimetre of overflowing into the Manor Park Estate at Wansey Gardens, Fleetwood Close being inundated, floodwater ponding in Waller Drive making the road impassable and with consequent flood damage to the Turnpike Industrial estate and houses in Cresswell Road.. Again, any development above Manor Park would reduce permeable lands, increase flood risk and be highly undesirable.

The future development of the villages and the Parish as a whole will need to ensure that flood risk is mitigated and minimised. Land needed for detention basins should be safeguarded and new developments should be directed away from areas of highest risk.

F. SUSTAINABILITY

The sustainability of the Parish is poor due to:-

- the inherent lack of facilities for the size of the population
- the lack of effective public transport
- the topography driving the need for a heavy dependency on cars
- the heavy dependency on Newbury and Thatcham for almost all services
- the real and proven surface water flooding risk with unfunded mitigation measures
- the lack of realistic opportunity to upgrade the road system to mitigate the heavy traffic volumes, congestion and speeding issues

ASPIRATIONS FOR DEVELOPMENT

o Allow only small scale developments, preferably in clusters, and in-fill of housing to keep the rural character of the Parish intact, and whenever possible contain development to within the current settlement boundaries of the villages and associated hamlets of the Parish.

o Increase the supply of smaller and starter (2 -3 beds) family homes to attract younger families to the Parish.

o Provide additional sheltered housing for an ageing population.

o Maintain integrity of the green spaces - farm lands between the Parish and its neighbouring towns and villages.

o Reduce speeds and volume of traffic in transit through the Parish.

- o Maintain and improve the amenity value of the existing open spaces AONB / Wild Life sites / SSSI / Farm land / Woodlands, in and surrounding the Parish.
- o Increase and improve flood prevention, particularly at the bottom of Cold Ash Hill in the vicinity of Southend and Little Copse, and at the base of Stoney Lane.
- o Reduce or eliminate any industrial or mineral extraction activity in the Parish and its fringes.
- o Improve the quality of St Marks Primary school buildings and facilities over time.
- o Improve the Cold Ash village hall to allow for greater use by Parishioners.

CENSUS CONCLUSIONS 2001/2011

	2001	2011	INCREASE
W BERKS	144483	153822	+6.5%
COLD ASH	3625	4063	+12.0%
THATCHAM N	5257	5870	+11.7
S	5074	6974	+37.4
W	6374	6390	+0.3
C	6119	6033	(1.4)
E	22824	25267	+10.7
CLAY HILL	5705	6827	+19.7
CHIEVELEY	2710	2890	+6.6
BUCKLEBURY	5922	6730	+13.6

Observations:

1. Thatcham has been absorbed 26% of population growth in a base population of 16.4% of WBC
2. 613 extra people in Thatcham north in 10 years
3. Thatcham + Cold Ash + Clay Hill + Bucklebury $2443 + 438 + 1122 + 808 = 4811$
 - Growth +4811 = 51.5% of WBC total growth

PARISH DEVELOPMENT ATTITUDES

	2008	2012
Maintain rural character	95%	96%
Preserve physical gaps	93-94%	97%
Large scale development will change rural character	96%	97%
Housing to respond to Parish needs	91%	91%
• Met by infilling	66% for 18% against	
• Settlement boundaries reviewed if needed	57% for 27% against	

Desire for small scale developments: VDS HOU3

CAR DEPENDENCY

Car Usage/Activity

Bases are responding households

	2002	2008	2012
WORK		75% (70-85) (70-86)	78% (72-83)
SCHOOL	51%	56% (46-77)	48% run (16-58) 37% activities (27-44)
SHOPPING		75% (67-77)	daily 38% (24-50) weekly 86% (60-95)
HEALTH SVCS			88% (80-91)
SOCIAL SVCS			50% (27-63)
LEISURE			90% (76-96)

SOURCES

1. PP Development questionnaire (2008) (42% RESP RATE)
2. CAPC & CACP Parish questionnaire (2012) (21% RESP RATE)

Note: Figures in brackets in table above denote min/max range across five Parish survey areas

DEPENDENCY ON NEWBURY & THATCHAM

2008

Work in NBY/THAT 59% (of 680px)

SHOPPING (WKLY)

Newbury 44%

Thatcham 29%

Out of town 21%

63% use village shop at least weekly

15% 5 + Day

28% 2-3 / wk

18% Weekly

- As a convenience store/paper/post office

HEALTH 100%

SCHOOL

Secondary 100%

POPULATION OF COLD ASH PARISH

	Census 2001	Census 2011	Growth	%
Total population	3625	4063	438	17%
Downe House School St Finians & Nursing Home	(570)	(566)	(3)	(0.1%)
Total in households	3055	3497	442	14.4%
Households	1180	1365	185	15.8%

Note: 2011 census figures include 477 in Downe House School.

Pattern of growth in dwellings in Cold Ash between 2001 and 2011

2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	total addt'l
02	03	02	06	30	04	46	02	58	36	189

Housing type

	2001	2011
Detached house/bungalow	67%	63%
Semi-detached	24.4%	25%
Terraced / End of	8%	8.2%
Flats/Maisonette	0.6%	2.1%
Vacant not defined	0%	1.5%

Eight Service Villages (total 5386 dwellings in 2001, 6188 in 2011). Increase 14.8%

Village	2001	Added	2011	%
Aldermaston	454	51	507	11.2%
Bradfield	627	24	664	3.82%
Chieveley	950	65	996	6.84%
Cold Ash	1177	189	1366	16.06%
Great Shefford	384	21	413	5.46%
Hermitage	454	291	745	64.09%
Kintbury	1045	69	1125	6.60%
Woolhampton	295	88	377	29.83%
Total	5386	798	6188	14.81%

EXTREMELY LOW USE OF PUBLIC TRANSPORT

Census figures 2001/2011

Travel to Work	2001	2011
Work mainly from home	8.5%	7.3%
Train	2.0%	3.0%
Bus	1.0%	1.4%
Car	48.9%	51.0%
Cycle	1.4%	1.4%
Walk	2.6%	3.7%
Not in Employment	33.9%	31.5%

Cold Ash Community Partnership survey 2008

	Bus	Train
WORK	3%	9%
SHOPPING	4%	1%
SCHOOL	13%	
REGULAR USAGE		7%

Public transport seen as inappropriate by 90% of residents

V3.1 03.02.14

Summary Volume Analysis: - Cold Ash Road network- average weekly rate

Road		Direction	Sheets 1&2	
		Sheets 1/2	Total volume (both ways) k/week	Volume % Heath Lane
Ridge Road, Cold Ash	opp.'Silver Birches', SDR No 1207	West/East	10.5	13
Slanting Hill, Cold Ash	100 metres North of Hermitage road, SDR No 1198	North/South	9.3	11
Stoney Lane, Newbury	opp. 'Field Ridge', SDR No 463	South/North	5.9	7
Tull Way, Thatcham	Henwick Manor Entrance, SDR No 391	SW/NW	63.7	78
Waller Drive, Newbury	Marston Drive, SDR No 852	West/East	4.0	7
Heath Lane, Thatcham,	East of Billington Way, SDR No 342	East/West	2.4	5
Heath Lane, Thatcham	Norlands, SDR No 738	North/South	81.8	100
Red Shute Hill, Cold Ash	75 metres SE of Sawmill Road, SDR No 1199	SE//NW	24.6	31
Cold Ash Hill, Cold Ash	Btwn Gladstone Lane & Harewood Drive, SDR No 203	South/North	28.2	34
Cold Ash Hill, Cold Ash	Outside St Mark's School, SDR No 705	North/South	35.1	43
Collaroy Road, Cold Ash	North of Gladstone Lane, SDR No 704	North/South	0.5	1
B4009, Shaw Newbury	Shaw Hill, SDR No 988	South/North	22.3	45
B4009, Long Lane	South of Mousefield Farm, SDR No 179	North/South	20.5	9
Ashmore Green Road			0.0	0
Fishers Lane	Fishers Lane Old Water Works, SRD No 253	East/West	3.5	5
Long Lane, Shaw Hill	B4009, Shaw Hill, Newbury, roundabout sign north of Kiln Road, SDR No 473	South/North	50.1	60
Kiln Road, Shaw	Kiln Road, opp. No 16, SDR No 279	West/Eastst	29.4	36
Turnpike, Shaw	Turnpike road, Newbury, o.s. No 81, SDR No 782	East/West	31.2	39
Hermitage Road, Cold Ash	Hermitage Road Xrds sign after Fishers Lane, SRD No 1225	South/North	29.6	37
Cold Ash Hill, above Hatchgate Close	Cold Ash Hill o.s. Assissi Cottages, SDR No 751	North/South	7.0	11

Comments

Heath Lane, Cold Ash Hill, Long Lane (Shaw Hill), Hermitage Road, Kiln Road/Turnpike bear significant daily volumes of traffic, when compared with Heath Lane. See Volume Comparison.

The Ridge, Fisher's Lane and Stoney Lane bear significant volumes of East/West traffic for their width, as little as 2.9m, 19.9k.

Of particular concern are the volumes of traffic on Cold Ash Hill outside St Mark's School and the speeding on Cold Ash Hill above Hatchgate Close. Peak rush hour volumes are 500/hour o.s.St Mark's School

At peak times there are extensive queues at critical junctions on the Cold Ash Hill/Hermitage Road. Residents are locked in from access in peak hours

HGV abuse remains an issue

The trees and banks of the lanes are routinely damaged

Of the Cold Ash parish road network, only the Hermitage Road and Cold Ash Hill are C-class adopted roads

The combination of Long Lane (Shaw Hill) and Kiln Road/Turnpike volumes illustrate the traffic pressure in Shaw-cum-Donnington and the daily gridlock up to the Robin Hood Roundabout.

Kiln Road and its roundabout system/children's crossing over Shaw Road/ pedestrian & cycling footpaths is in a state of stress at the morning peak hour

Source: WBC Traffic data logging 2012/13

Appendix 3: Further information form Compton Parish Council

Compton Parish Council

Strategic Housing Land Availability Assessment Response

General Comments

The Local Planning Authority has recognised Compton is an unsustainable service village and cannot sustain a development in excess of 300 houses, as defined in the Core Strategy. It is felt that no extension to the settlement boundary should be considered until the plans for the development of the Pirbright Institute Site, COM004, have been finalised and all brown field sites within the village have been developed.

COM001 and COM012

It is felt this is important open space within the village and development here would be detrimental to the character of the village and would fail to enhance the AONB.

COM002

It is agreed that this land is not currently developable. The railway line forms a boundary to the village and development outside this boundary is considered inappropriate. There is also a potential for flooding on this site.

The pictures below show the flooding on the site and on the access road to the site on the 14th February, 2014.





COM004

Development of this site should be carried out prior to introducing new sites within Compton. The Council insists that the cricket pitch is protected from development.

COM007/008/009/010/011

The document refers to site contamination in COM004, however, there is some concern that sites COM007/008/009/010/011 will also have similar contamination due to being owned by the same owner and therefore having the same use.

COM007

Development of this site would extend the village boundary too far. Potential access to this site from Ilsley Road is not deemed to be satisfactory.

There is also significant concern over the risk of flooding on this site which provides a significant flood plain protecting the village. The picture below shows the flooding on the site on the 17th February, 2014.



COM008

There is significant concern over the risk of flooding on this site which provides a significant flood plain protecting the village. The pictures below show the flooding on the site on the 17th February, 2014.



COM009/010/011

Development of these sites is not desirable as it would infill the area between the village and Down House. These sites sit on a bank; therefore access would be difficult to Ilsley Road and is not felt to be appropriate from Churn Road due to the rural nature of this road.

COM007: Land between Cheseridge Road and Ilsley Road

Flooding at February 2014



Appendix 4: Lambourn Parish Council Public Consultation on the SHLAA– summary of responses

SHLAA sites in Lambourn

Summary of comments (*indicates multiple identical comments/concerns)

Land at Meridian House & Stud, Greenways (LAM002A)	Land adjoining Lynch Lane (LAM005)	Land between Folly Road/Rockfel/Bridleways/Stork House Drive (LAM007)	Land east of Hungerford Hill (LAM009)	Windsor House Paddocks (LAM013)
Access: Via Coppington Gardens impact on Bockhampton Road/Station Road; via Meridian drive very narrow; Greenways unsuitable and would increase traffic near school ***	Visual impact. Open space with lovely views. **** Significant landscaping/tree planting to integrate site into landscape	Access: Folly Rd unsuitable* for whole site. If only large houses continuing the Folly Road pattern*, then access for them and footway only to lower site. Lower site from Rockfel Road.	Access: NOT Hungerford Hill because dangerous. Undesirable off Greenways. *****	Drainage: Floods. Natural protection for centre of village. Building here likely to cause flooding elsewhere in village. ***** Need for sustainable drainage
Drainage: Impact of run-off *	Drainage: Problem. Pond solution/ sustainable drainage in conjunction with groundwater solution. *****	Drainage: Impact of run-off * Fragile water mains on Folly Road – several bursts in last few months.	Visual impact, esp. at entrance to village/character of landscape affected ***	Significant green area within Lambourn
Worth considering	Most appropriate site?* Good access *	Effectively takes a yard out of racing *	Too steep **	Good access
	Joining settlements, loss of "green belt"	Visually prominent **	Drainage issues – where were the displaced water go? *	Least visual impact of sites
	SSSI impact *	Access poor		
	Impact on Old Cricket Field			
	Agricultural use *			

There were also comments about the effect on all the sites of the lack of infrastructure and services in Lambourn. Concerns were expressed about whether the school and the surgery could cope with extra families; the lack of bus services to secondary schools; the decline in public services e.g. the library, the bank.

Flooding was an obvious problem, especially the complex relationship between sewage and surface and ground water. (Verbal comments, see over)

Analysis of responses to SHLAA consultation

	None	1	2	3	4	5	Total
Meridian/Bockhampton Road							
LAM002A	24%	31%	13%	9%	9%	14%	100%
The Park/Lynch Lane							
LAM005	17%	8%	9%	9%	9%	49%	101%
Folly Rd/Rockfel Rd							
LAM007	14%	27%	21%	18%	9%	12%	101%
Hungerford Hill/Greenways							
LAM009	24%	6%	10%	18%	23%	18%	99%
Windsor House Paddock							
LAM013	21%	13%	19%	18%	14%	14%	99%

Highway

Total number of responses to preferences: 78

Approximate number of visitors: Over 100

Appendix 5: Lambourn Parish Council Fluvial Flooding Report



LAMBOURN PARISH COUNCIL

The Memorial Hall, Oxford Street, Lambourn, Berkshire. RG17 8XP
Telephone: 01488 72400

Clerk: Mrs Karen Wilson
Assistant Clerk: Mrs Nichola Weck

email: lambournpc@btconnect.com

Thank you for the notes of the discussion from the workshop. (Please note, the 10" water main in Folly Road has burst 3 times, not 10.)

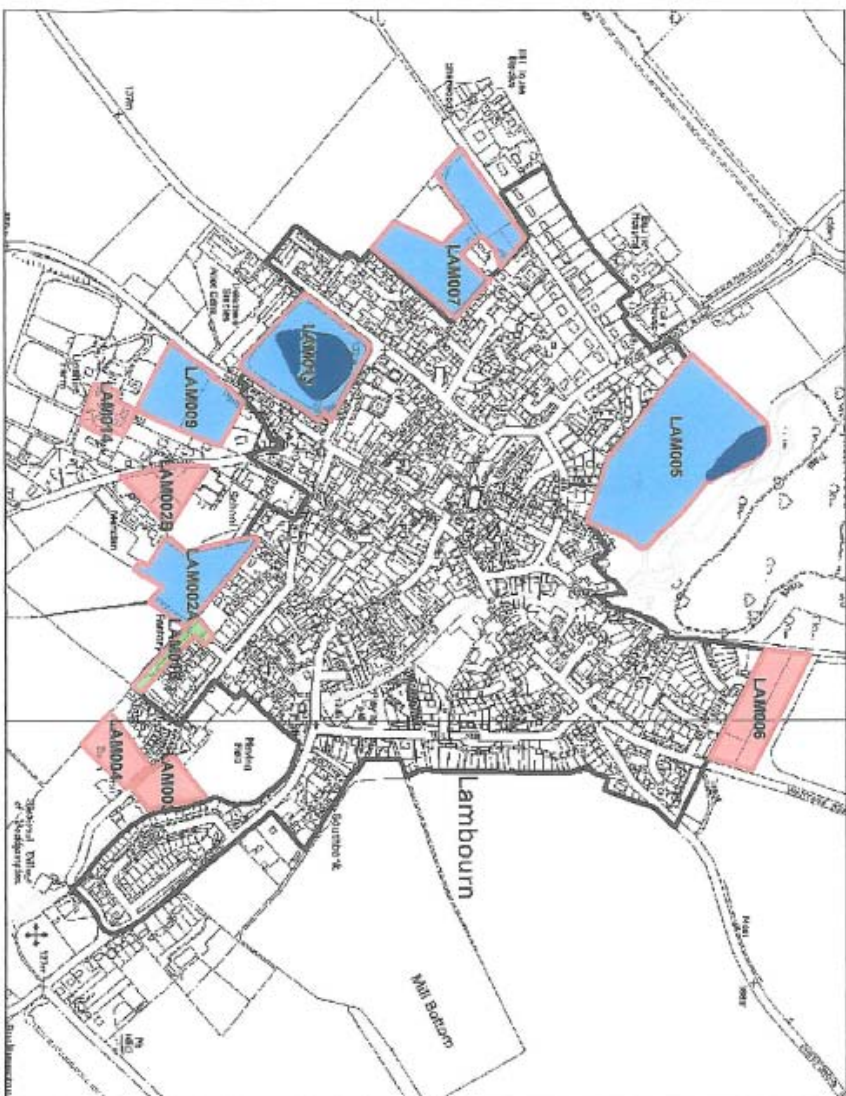
I enclose further information about flooding of two sites in Lambourn – LAM005 and LAM013.

The map shows the approximate extent of groundwater flooding to both sites in February 2014.

In the case of LAM005, it is not possible to go onto the site, so observations were made at some distance from the opposite river bank. There was standing water in the field, as shown, and the ground appeared very wet.

In LAM013, the sudden rise in the water level between 8th and 14th February (as shown in the enclosed photographs) seems to have been due to ground water, but augmented by surface water.

I also enclose a copy of the report on Allotment Flooding, commissioned by the Parish Council and the Allotment Society in 2008. The Parish Council's Allotments border LAM013 to the southwest. Increasingly frequent flooding events, caused by both ground- and surface water, especially a very large flood in July 2007 (see separate photograph), caused the Council to request the Report. Parishioners are very concerned that flooding could again affect the centre of the village.



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<p>Legend</p> <ul style="list-style-type: none"> ■ Developable ■ Deliverable ■ Not Currently Developable ■ Potentially Developable ■ Outlets Settlement Hierarchy ■ Settlement Boundary ■ Ground water flooding 2014 	<p>Reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationary Office. © Crown Copyright 2014.</p> <p>Unauthorised reproduction infringes Crown Copyright and may lead to criminal proceedings. © West Berkshire District Council 100024151.</p>
<p>2010/1/2014</p> <p>1:50230</p>	



LAM013: Windsor House Paddock 14th FEB. 2014.
Taken from horse track / gallop at the gateway
in the paddock from Crowle Road, looking towards
Hungerford Hill. Shows land above flood level
on that side of paddock.



LAM013: Windsor House Paddock. 8th FEB. 2014.
Taken from gateway from Crowle Road, looking
towards Hungerford Hill.



LAM013: Windsor House Paddock. 15th FEB. 2014.
Taken from Hungerford Hill end of Crowie Road,
looking towards Baydon Road. Showing land
above flood level on that side of Paddock.



LAM013: Windsor House Paddock. 15th FEB. 2014.



LAM013: Windsor House Paddock.

15 FEB. 2014

View along horse/track gallop, looking towards Hungerford Hill. Crowle Road is to the right, behind the hedge. Water across track. X marks pump.



LAM013: Windsor House Paddock.

15 FEB. 2014

View from Crowle Road, showing extent of water across horse track/gallop. Pump carrying water into drain, marked by cone.

Appendix 6: Lambourn Parish Council Allotment Flooding Report

LAMBOURN PARISH COUNCIL

ALLOTMENT FLOODING – REPORT ON INVESTIGATIONS BY ADAS

Background information

Lambourn Parish Council contacted ADAS as a result of experiencing significant flooding of their allotments in March and July 2007 and again in 2008, which caused damage to the allotment plots, as well as flooding parts of adjacent fields and the village itself.



Photo by Lambourn Parish Council - March 2007

The Council believe that the flooding is increased by the following contributory factors:

- Unprecedented high amount of rain fall
- Change of land use (from arable use to pasture) on the neighbouring fields that are on higher ground
- Excessive water running down the road due to inadequate draining by the Council Highway management
- Building of embankment around the gallops which stops the natural flow of the water
- That the building of new houses in the village (further down ^{the hills, below} Crowle Road) have resulted in blocked drains – but no evidence has been found to prove this.

The Allotment Society together with some Councillors have already considered some potential solutions, including the construction of a soakaway next to the allotment car park and a culvert under the raised gallops immediately down slope from the allotments. The idea



is that the soakaway would catch some of the water before it reaches the allotments and that the culvert would allow the water ponded over the allotments to escape onto the gallops.



Photo by Lambourn Parish Council - July 2007

Site investigations

Chris Thomson, Soil and Water Engineer of ADAS visited the site on 9 December 2008 and met with various members of the Parish Council and was shown around the allotments.

Discussions included the proposals for the soakaway adjacent to the car parking area for the allotments and the installation of a culvert through the raised gallops on the adjacent land just downslope of the allotments.

At the time of the site visit the ground was damp, but there was no ponded water present on either the allotments or the adjacent fields. However, there were signs of deep water movement across the allotments and nearby field boundaries, with tall vegetation laid flat by the weight of the water.

Further up the valley there were also other signs of the flood water movement around the Environment Agency pumping station near Hatchets Corner, with dead leaves swept into flow lines by the water and also where water crosses the road by Farncomb Farm, with signs of debris on the road and verges.





Photo by Lambourn Parish Council showing raised gallops

The catchment extends all the way up to and beyond the M4 motorway by Baydon, with the two main valleys being those extending up to Bailey Hill Farm and through Farncomb Down by the gallops cut into the down. The upper end of Farncomb Down is cut off by the Motorway embankment, where there appears to be no balancing pond or drainage system to catch water running off the motorway.

The plan at Appendix 1 shows the approximate area of the catchment in red and the valley features in blue.



Looking east along Farncomb Down from just below the M4



Looking east from the track beside the pumping station

Almost all of the catchment is down to grass, with only one field showing signs of recent arable use and now being grazed by sheep.

Signs of surface water flow were obvious in almost all of the valley floors, with changes in vegetation, or bare ground showing the path of water movement.

There was a hole dug in the field opposite Farncomb Farm, exposing the soil profile and the fact that waterlogging was present.



Hole dug in field (by others) opposite Farncomb Farm – note water in base

Discussion

Based on the rough plan shown at Appendix 1 the catchment area has been estimated at approximately 800 hectares (1980 acres).

This catchment extends through seven valleys, with the longest being nearly 5km (3.1 miles) in length from the allotments right up to the M4 motorway.

Based on the above, the expected runoff from the catchment would be in the region of 8600 cubic metres and with the allotments being around 8800 square metres in area this would fill them up to nearly a metre deep in water, which is what has been experienced.

Flooding appears to have become more and more regular since 2007 from rainfall events of even a moderate size, with runoff water arriving quickly at the allotments and causing partial flooding, although generally of short duration (less than 3 days). This is found elsewhere when we look at changes in rainfall patterns in that we tend to find that the rainfall is of shorter duration, but greater intensity – instead of a steady drizzle all day, you get a heavy downpour for an hour and although the total amount of water may be similar the intensity means that the soil surface becomes waterlogged quickly and the water doesn't get a chance to soak into the soil profile.

There is also no doubt that the change of land use from arable to rough grassland (arable reversion) appears to have had a significant affect on the ability of the catchment to absorb the water into the soil profile, especially as there should be permeable chalk below the covering of soil, which would normally readily accept the rainfall. Rainfall landing on the grassed areas of the catchment now appears to runoff at the surface more than it used to soak into the cultivated arable land and so instead of the rainfall load being spread across the whole of the catchment it becomes concentrated in the valley floors quite quickly and flows down toward Lambourn and the allotment area.

During my visit it was not possible to ascertain if poor drainage of the surrounding highways was having an effect on the flooding of the allotments. However where the catchment path crosses the road by Farncomb Farm I is possible that a proportion of the water flows down the road instead of across into the field opposite Farncomb Farm, which would speed up



delivery of water to the allotment area. This is however only a supposition as there was no evidence on the day to prove this possibility.

The raised gallop certainly has an effect of creating a barrier to water flow downslope from the allotments and is therefore contributing to the flooding of the allotments. Were it not there, then the water would simply flow through the allotment area and into the field where the gallops are. It is understood that this has happened historically and a pond has been formed in this field historically, even providing opportunity to skating during the winter months. The main factor to consider here though is that although it is contributing to the flooding of the allotments, it is also acting as a good barrier to slow down the flood water from reaching the village and causing flooding within the areas of housing. This could cause risk to life and therefore it is preferable to flood allotments that it is to flood housing.

The final point was in relation to the new housing along Crowle Road and looking at old maps from the later 1800's there are no signs of ditches or watercourse through what is now urban built-up parts of the village, so it is not possible to say whether any old drains have become blocked or cut off by the housing developments over the years.

Conclusion and recommendations

The original questions put forward by the Parish Council were firstly what impact might the proposed soakaway uphill of the allotments have and secondly what effect the installation of a pipe or pipes under the raised gallop would have.

It is clear from the extent of the catchment area that the size and location of the proposed soakaway by the allotment car park will not have any significant affect on the current flooding of the allotments. It is too small and too close to the allotments. If this sort of solution is being considered then it should be much much larger and situated further up the valley – probably somewhere in the field opposite Farncomb Farm at the point where the blue lines first separate in the plan at Appendix 1.

The idea of a pipe or pipes under the raised gallop would indeed help get the water off the allotments more quickly, however as already indicated there is a far greater risk that this will increase the flooding of the houses in the part of Lambourn between Crowle Road, the High Street, Parsonage Lane and Baydon Road, i.e. the St Michaels Close new housing area.



This is not to be recommended without an alternative scheme in place first, e.g. the larger soakaway / pond opposite Farncomb Farm, or a flood relief scheme to take water away from the housing areas once it has breached the raised gallops.

The factors leading to the flooding experienced have been correctly identified, such as the changes in the rainfall patterns, the changes in land use up the valley and the influence of run off from hard surfaces such as roads, etc., however the solutions put forward are only of a very small scale to counteract what is a large problem.

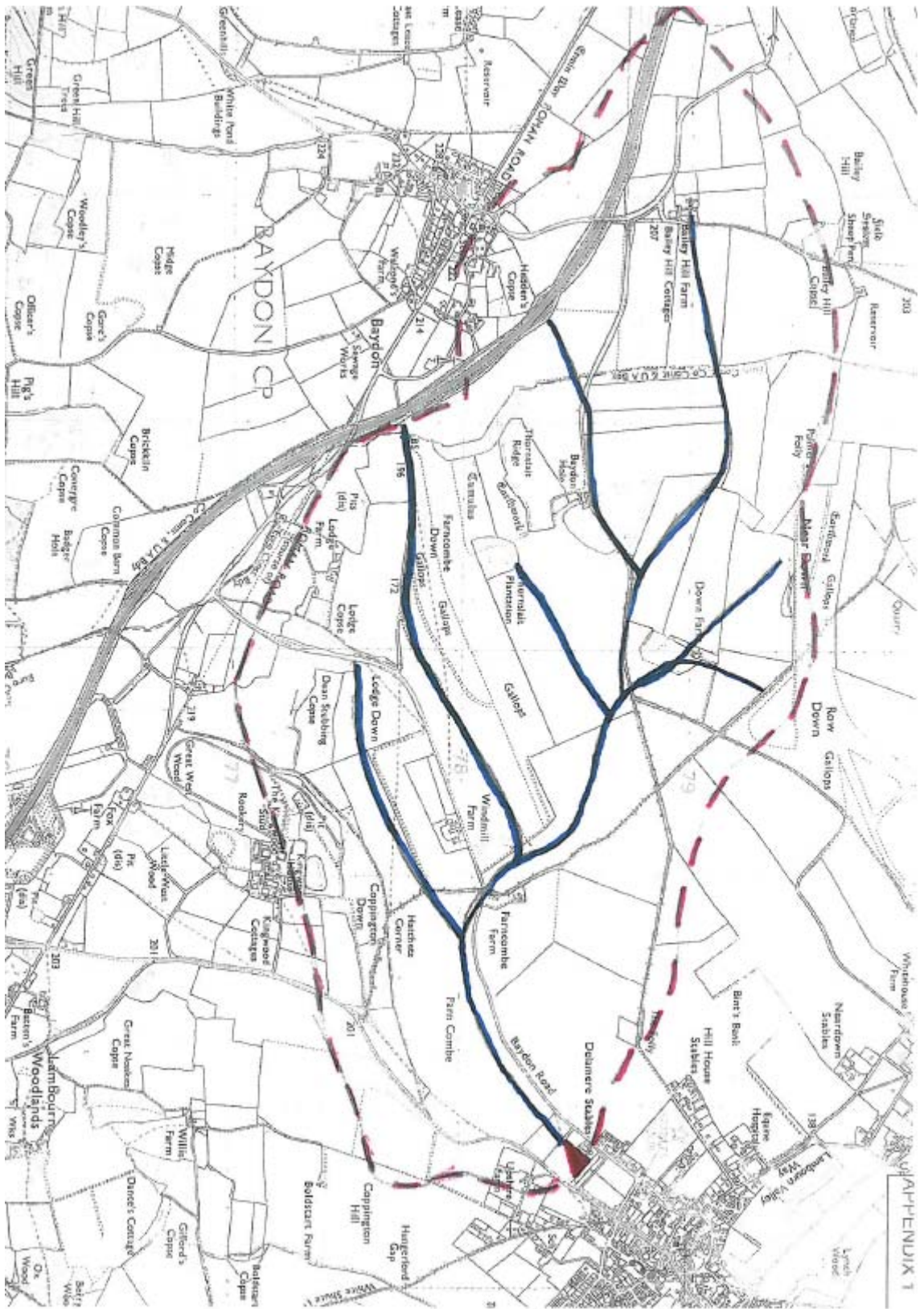
A soakaway pond 20m by 20m by 2m deep by the car park would only cater for 10% of the anticipated runoff water, hence it would not make a significant difference.

What is required is a larger scale process, to get a larger proportion of the rainfall to soak into the ground where it lands and not for it to runoff down the valleys. This is potentially difficult as the farmers are under the control of the Defra scheme they subscribe to and may not be allowed to carry out operations such as subsoiling or vertidrainage that would achieve greater infiltration of the water without necessarily having to go back to arable farming. Further investigation with both Defra and the Environment Agency is required on this front.

The alternative solution is to move the allotments so that the flooding only affects barren or less well used land. Typically in the past allotments were put in floodplains as one way of maintaining the land as a floodplain and preventing it from becoming built upon, so it is not insignificant that the allotments at Lambourn also occupy such a position. The Parish Council does own land adjacent to the allotments which is on the sloping edge of the valley and which does not appear to flood as deep or as regularly, so there is potential to move the allotments in that direction and with the right machinery and methodology it would be possible to swap the good soil of the existing allotments piece by piece with the less well tended soil on the higher ground.

In the end it may never be possible to completely solve the flooding problems, but perhaps reduce the depth and frequency of the flood events, by carrying out some beneficial activities further up the catchment and so a part and part solution may be required, where those allotment owners who do not want any flooding are given the opportunity to move uphill and those that mind less can stay where they are.





APPENDIX 1



Flooding in Crowle Road, Lambourn. July 2007
(Windsor House Paddock is on the left. Water flowed down through the Paddock and across Crowle Road, down the High Street and through the buildings on the right of the photograph, flooding properties in the High Street and the Old Coachworks)

Appendix 7: Chieveley Parish Council additional comments

Chieveley Parish Council

Clerk to the Council: Mrs T Snook

16 Middle Farm Close

Chieveley, Newbury

Berkshire RG20 8RJ

Tel: 01635 247507

Email: chieveley.pc@btinternet.com

19 March 2014

Planning Policy Team
West Berkshire Council
Council Offices
Market Street
Newbury
Berkshire
RG14 5LD

Dear Sir/Madam,

SHLAA consultation feedback for Chieveley

I refer to our workshop meeting on 4 February 2014 and your email and draft meeting notes of 19 February. On behalf of Chieveley Parish Council I now set out below the Council's response to the consultation event and your draft notes.

First, I would like to take this opportunity to thank the Planning Policy Team for the briefing that was provided and the opportunity for the Parish Council to provide its views at an early stage of the preparation of the SAD DPD. We think this is an important step and we hope that it will lead to a more robust outcome that will reflect local needs and aspirations.

As requested, our comments on your draft meeting notes for Chieveley and Hermitage are attached. Also for your consideration is a draft of the report on the Public Meeting and Questionnaire survey undertaken on the SHLAA sites for Chieveley and Oare by the Parish Council in January and February this year. The Parish Council has taken a number of things into account in formulating its response to this consultation, including the adopted Core Strategy for West Berkshire. The Parish Council's views on local needs have also taken into account the responses we have received through this consultation exercise as reported here. The preliminary results were also available to us when we met on 4 February and we were also able to take them into account at the workshop.

We are still in the process of finalising the presentation version of the report and will forward a copy to you in due course. However the main body of the responses is reported and those will not change significantly.

On the principal issue of how much new housing should be provided at Chieveley within the next local plan period, the Parish Council agrees with the consultation responses that were overwhelmingly in favour of less new housing being allocated at Chieveley through the SAD DPD than the 94 dwellings that have been developed in and around Chieveley since the last local plan was produced.

Residents have expressed a wide range of comments and issues that are captured in the report but the main point is that there is no evidence that development on any greater scale than about 75 dwellings is required to meet local needs. That was also what was concluded from the 2006 Chieveley Housing Needs survey and nothing has fundamentally changed since that time. The Core Strategy clearly states that development at service village level should only be to meet local needs and any site allocation at Chieveley above about 75 dwellings would exceed that criterion and would not be in accordance with the Core Strategy.

Bardown (CHI002) should be included. However the Parish Council objected to the original application on the grounds of its landscape impact and the inadequacy of landscaping in the scheme. This point now appears to be supported by West Berkshire Council's own landscape assessment. The Parish Council also shares the view of a many residents that the density of development on the site is too high and whilst that may have reflected the prevailing policies at the time of the 2006 application, the current policies and the Core Strategy would support a lower density of development in this countryside location.

The Parish Council shares the concern of many residents of Chieveley over the potential coalescence of sites and cumulative impact of potential development along the western side of the High Street. It had previously been agreed that if the development at The Green went ahead, the land between The Green and Manor Lane would be retained in agricultural use. This was recorded in the last adopted Local Plan. The Parish Council agrees that undertaking should be upheld and site CHI007 not included in the SAD DPD as a housing site. To do so would undermine the credibility of any similar open space designation that might be agreed in the future.

Further consideration in the options for consultation does appear worthwhile for site CHI015 on School Lane. This site has yet to be subject to landscape and traffic assessments. It should only be included for further consideration if the traffic benefits of the proposed school car park/drop off area are (a) supported by the School itself and (b) deliverable through the allocation of the site being accompanied by a S106 agreement.

Sites CHI019 and CHI020 are within the settlement boundary and development of these sites would be in accordance with existing policies anyway. Site CHI010 is also partially within the settlement boundary but that would still need to be reviewed if this site were included. The Parish Council believes that these sites could be included in the options for consultation but all require particular attention to density and design issues.

The access proposed to CHI010 is a particular concern as it is close to the Day Nursery on the High Street and the density of development on this site should be reduced accordingly.

The Parish Council does not see a need for any radical change to the settlement boundary criteria that have served the district well. That includes the first two criteria (on close knit physical character and dispersed or ribbon development), criterion 7 (open undeveloped parcels on the edge of settlements) and excluding from the boundaries areas of scattered and loose-knit development. Accordingly sites CHI001, CHI014, CHI017 and CHI016 should not be considered further. In the case of CHI017 this point is specifically supported by the Council's recent refusal and the dismissal of the appeal on application ref 13/00025 at the Old Stables, Green Lane.

The sites in Chieveley Parish that were identified as potentially developable in the hamlet of Oare (HER011) are clearly in the countryside. Oare should remain outside the defined settlement boundaries and there is no rational basis for amending those boundaries to include these sites which should not be considered further.

Overall, the Parish Council believes that development required to meet local needs within the period of the Core Strategy/SAD DPD should be met within the Bardown site CHI021. If additional development were required then the options for consultation should include the sites where a case for inclusion can be made as discussed above. In addition, if other options are required the options for consultation could include the southern part of CHI011 subject to landscape assessment, an access study and securing potential benefits in this location such as improved parking for the Doctors' surgery and the potential release of land for a new burial ground for the village.

The phasing of new development is also an important consideration. Over the local plan period local needs will be better met if development occurs in blocks of 20-30 houses instead of all being built at once.

Finally, you referred to the demolition of the former Council houses at Bardown as being a negative figure on the housing supply in the current local plan period. We are not sure that is a correct approach. Firstly, we will check our records but the Chieveley Housing Needs Survey report of April 2006 refers to half of the dwellings at Bardown being demolished by that time. So at least some of these houses may have been demolished before 2006. Either way, they were clearly not being let by Sovereign Housing and considered 'available' in 2006.

Secondly, regardless of whether they were physically demolished in 2005 or 2006, all of the houses at Bardown that were demolished were removed from the housing supply 8 years or more ago have no practical relevance to the assessment of local needs in 2014.

The school, the Doctor's surgery, the village shop and all the local other services which appear well used and in good condition today have all functioned for so long since the demolition of these properties as to make the historical event of their removal immaterial to the current operation and needs of facilities and services in the area.

Yours faithfully

Tracy Snook
Chieveley Parish Clerk

Appendix B

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18)

Notice of Intention to Prepare a Housing Site Allocations Development Plan Document (DPD)

West Berkshire Council is preparing a Housing Site Allocations Development Plan Document (DPD). The Council is required to notify specified bodies and persons of the subject of the DPD which it proposes to prepare and invite each of them to make representations to the Council about what the DPD ought to contain. The Council's proposals are set out below.

- The scope of this document is to allocate the remainder of the housing figure identified in the Core Strategy by allocating specific smaller scale housing sites for development in accordance with the spatial strategy set out in the Core Strategy.
- The plan will relate to the geographic area of West Berkshire and cover the time period to 2026.
- Pitch provision for Gypsies and Travellers will also be included based on an up to date Gypsy and Traveller Accommodation Needs Assessment.
- Several housing related development management policies including those to manage development in the countryside will form part of the DPD.

The Council will take into account any representations made to them in response to this invitation.

Details in terms of the timetable for the production of the DPD are set out in the table below.

	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 Site Allocations DPD	September 2013 to October 2013	September 2013 to December 2014	December 2014	April 2015	June 2015	December 2015

Comments on the proposed scope and content of the DPD should be submitted during the six week consultation period, running from Wednesday 30th April to Wednesday 11th June 2014. Representations can be sent electronically, via email to planningpolicy@westberks.gov.uk or posted to the Planning Policy Team, West Berkshire Council, Planning and Countryside, Council Offices, Market Street, Newbury. RG14 5LD

Appendix C

The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) Notice of Intention to Prepare a Housing Site Allocations Development Plan Document (DPD)

Summary of Representations

As part of the preparation of the Housing Site Allocations DPD the Council is required to formally notify specified bodies and persons of the subject of the DPD and invite them to make representations on what it ought to contain. The Council invited comments on the proposed scope and content of the Housing Site Allocations DPD for six weeks from Wednesday 30th April to Wednesday 11th June 2014. A summary of the representations received and details of how the representations will be taken into account in the preparation of the DPD are outlined in the table below

Respondent	Summary of Representation	Council's response
Giles Dereham	I am totally opposed to any new housing that impacts on traffic in Hollybush Lane, Burghfield Common/Sulhamstead.	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.
Steve Pickles of West Waddy commenting on behalf of the Englefield Estate.	Support allocation of remaining Core Strategy housing figure.	Comment noted
	<ul style="list-style-type: none"> • Agree with THE009 SHLAA assessment that this site is well related to Theale. However, uncertainty about Lakeside. • We are willing to discuss capacity issues at Theale Primary School, but not at THE009. • MOR005 – the Council's SFRA does not show any flooding incidents in this locality. • MOR006 – The estate is committed to working with the LPA to deliver a suitable access to this site, which is well related to the village. 	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> • MOR008 – This site is well related to the village. There are no identified local flooding events. Any drainage issues can be dealt with SuDS. • BUR015 – The Englefield Estate are willing for a smaller area than put forward to be allocated. • BRS002 – a change to the settlement boundary in this location would allow the site to come forward. 	
Jason Meredith of Floodline Developments	The DPD should include sites that are capable of sustainable development that comply with the Council's Flood Risk Strategy.	<p>The Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD. Regard will therefore be given to Core Strategy policy CS16 (flooding). Policy CS16 was prepared within the context of the NPPF.</p> <p>The site selection process will take into account flooding issues in accordance with national policy and policy CS16 of the Core Strategy. The site selection process will automatically exclude potential housing sites that fall within flood zone 3.</p>
	The response details a number of beneficial areas that development at THE007 would represent.	Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.
Lance Flannigan of Nexus Planning on behalf of Pangbourne Beaver	Pangbourne Beaver Investments seek the allocation of SHLAA site PAN003.	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.

Respondent	Summary of Representation	Council's response
Investments Ltd	<p>Compliance with Procedural Requirements:</p> <ul style="list-style-type: none"> • Taking all the procedural requirements into account, a period of 32 days is clearly insufficient time for the Council to receive and consider the representations made on the preparation of the Housing Site Allocations DPD, as well as addressing the representations in the DPD itself and preparing the document for publication. • The proposed timetable for the publication of the 'Preferred Options' suggests that the DPD has already been prepared or is in the course of preparation without considering representations. • The preparation of the DPD is procedurally flawed. The period for preparing the DPD should be increased to 4-6 months if the DPD is to be found sound. 	<p>The Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD (a regulatory requirement), therefore the Housing Site Allocations DPD is more limited in scope and content (the Core Strategy DPD sets out the spatial strategy, policy framework and housing requirement). The process to prepare the DPD will therefore be shorter than that for the Core Strategy DPD.</p> <p>All of the comments made through the Regulation 18 consultation have been analysed and carefully considered as part of the ongoing preparatory work on the DPD to further inform its scope and content.</p>
	<p>Compliance with the 'tests' of soundness:</p> <p>The DPD has not been prepared positively and does not conform with Para 182 of the NPPF because:</p> <ul style="list-style-type: none"> • The Core Strategy housing figure is based on out-of-date evidence and falls significantly short of objectively assessed housing needs. • The objectively assessed housing need for the plan period is 16,310, a shortfall of 5,810. • None of the Core Strategies covering the West Central Berkshire Housing Market Area use objectively assessed housing need. Therefore, substantial additional housing provision will be required to meet the housing needs of the SHMA in this area. It is likely that any housing provision shortfall will exceed 5,810 dwellings. • The Council cannot demonstrate a 5 year housing land supply and therefore the housing policies within the Core Strategy are out of date. • Housing provision based on RSS figures should not be used. 	<p>Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> The DPD should be prepared using paragraph 47 of the NPPF, which LPA's to boost significantly the supply of housing by using their evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing. 	<p>allocations to meet the first proportion of the objectively assessed need.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme (LDS) and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility</p>

Respondent	Summary of Representation	Council's response
	<p>Compliance with the Spatial Strategy for the North Wessex Downs AONB:</p> <ul style="list-style-type: none"> • ADPP1 Requires housing provision to follow the existing settlement plan in accordance with the District Settlement Hierarchy and the Area Delivery Plan policies for the four spatial areas. • Of the 1,348 dwellings that have already been completed or permitted in the AONB 518 have been outside the settlement hierarchy. This is contrary to policy ADPP5 which states that the spatial distribution of new housing to be focused on Rural Service Centres and Service Villages • There is a serious imbalance in the spatial distribution of new housing in the AONB spatial area. Allocation of PAN003 will serve to strengthen Pangbourne's role as a Rural Service Centre. 	<p>including Sandleford Park and windfalls. A five year housing land supply can be clearly demonstrated. The five year housing land supply is set out in the Council's document 'Five year housing land supply at December 2013': http://info.westberks.gov.uk/CHttpHandler.ashx?id=35805&p=0</p> <p>Comments noted. The Housing Site Allocations DPD will be prepared within the context of the adopted Core Strategy DPD. The Core Strategy in policy ADPP1 sets out the spatial strategy for the district (identifying a settlement hierarchy and housing requirement). The Housing Site Allocations DPD will therefore allocate the remainder of the 'at least' 10,500 housing figure identified in the Core Strategy in and around the settlements of the district's settlement hierarchy.</p> <p>Whilst housing allocations will be made in accordance with the settlement hierarchy, policy ADPP1 also sets out that below the settlement hierarchy, smaller villages with settlement boundaries will be suitable for limited infill development. This is managed via the development management process.</p>
Mr. David Murray-Cox of Barton Willmore on behalf of A2Dominion	<p>The Housing Site Allocations DPD should be regarded as a Local Plan as it meets the requirements of Regulations 2,5 and 6 of Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Duty to co-operate:</p>	<p>The Housing Site Allocations DPD will form part of the Local Plan alongside the adopted Core Strategy DPD and Minerals and Waste DPD (which is in preparation).</p> <p>Comments noted. However, work on satisfying the Duty is taking place on an</p>

Respondent	Summary of Representation	Council's response
Developments	<p>Should the Council rely on the CS as the basis for this DPD, it will follow that the emerging DPD would be unsound because it has not been positively prepared in compliance with the statutory duty to co-operate.</p>	<p>ongoing basis. A paper has been sent out to those with whom West Berkshire needs to cooperate which sets out how West Berkshire Council will deal with strategic planning issues as part of the preparation of the Housing Site Allocations DPD. The paper seeks comments on the approach as part of the ongoing process of cooperation.</p> <p>The paper identifies that the strategic priorities are already agreed within the adopted Core Strategy DPD. Since the primary role of the Housing Site Allocations DPD will be to support the delivery of housing as set out in the Core Strategy DPD, we are tailoring our approach to the Duty to Cooperate as part of the Housing Site Allocations DPD accordingly. A series of strategic matters have been drawn out from the Core Strategy DPD which the Council considers to be of particular relevance to the Housing Site Allocations DPD.</p> <p>Outcomes from the consultation on this paper will be reported separately as part of the Duty to Cooperate process.</p>
	<p>Objectively assessed need:</p> <ul style="list-style-type: none"> • A SHMA has not been completed. • The DPD does not plan for the full, objectively assessed needs for market and affordable housing in the housing market area and as such it is unsound. 	<p>Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> • Evidence the Council's approach to this DPD is flawed is further demonstrated by the timetable for its production which indicates that it is to be adopted in December 2015, before which the updated SHMA should have been published. • The Council should use the updated SHMA to inform a whole or partial review of the CS and prepare a Local Plan based on this up-to-date evidence. This Plan should be prepared in accordance with the duty to co-operate and be based on an approach which meets the full, objectively assessed need for market and affordable housing in the area. 	<p>Work has now commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need. A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF.</p>
<p>Rob Ellis, of Barton Willmore on behalf of</p>	<ul style="list-style-type: none"> • HLM have concerns that should the Council continue to prepare a Housing and Site Allocations DPD as indicated, the Plan will be rendered unsound, and that the resultant effect would be the production of a Plan that is entirely ineffectual in seeking to deliver the requisite level of housing growth 	<p>Objectively Assessed Need:</p> <p>Whilst these comments are noted, they appear to be based on a misunderstanding</p>

Respondent	Summary of Representation	Council's response
Hallam Land Management Ltd	<p>as established by a thorough and objective assessment of housing need.</p> <ul style="list-style-type: none"> • HLM considers the DPD should not be progressed as currently proposed. It would be based on the outdated CS; it would not be consistent with national policy; and arguably the Council will not have fulfilled its obligations under the duty to co-operate. HLM suggest that the Council prioritises a review of the CS, and that progression of the Housing and Site Allocations Plan is premature at this stage. • HLM consider that should the Council decide to proceed as currently proposed then the DPD would be unsound on the basis that it would not be positively prepared and because it would be inconsistent with national policy. The effect of the under provision of housing would mean that the resultant DPD would be unjustified since it would not be based on proportionate evidence. Furthermore, the DPD would be ineffective, since it would not be based on effective joint working on cross-boundary strategic priorities. 	<p>of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>In order to find the Core Strategy sound, the Inspector committed the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA) within three years of adoption of the Core Strategy DPD in order to comply with the National Planning Policy Framework (NPPF).</p> <p>Work has now commenced on a SHMA in conjunction with neighbouring authorities in Berkshire. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need. A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for</p>

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		<p>both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandford Park and windfalls.</p> <p>Duty to Cooperate:</p> <p>The approach to the preparation of the DPD involves work on satisfying the Duty taking place on an ongoing basis. A paper has been sent out to those with whom West Berkshire needs to cooperate which sets out how West Berkshire Council will deal with strategic planning issues as part of the</p>

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		<p>preparation of the Housing Site Allocations DPD. The paper seeks comments on the approach as part of the ongoing process of cooperation.</p> <p>The paper identifies that the strategic priorities are already agreed within the adopted Core Strategy DPD. Since the primary role of the Housing Site Allocations DPD will be to support the delivery of housing as set out in the Core Strategy DPD, we are tailoring our approach to the Duty to Cooperate as part of the Housing Site Allocations DPD accordingly. A series of strategic matters have been drawn out from the Core Strategy DPD which the Council considers to be of particular relevance to the Housing Site Allocations DPD.</p> <p>Outcomes from the consultation on this paper will be reported separately as part of the Duty to Cooperate process.</p>
Alison Heine planning consultant	Can I please request that consideration be included of the need for Gypsy-Traveller sites in this district as this need has been very hard to provide for due to the extent of constraints in West Berkshire.	The Housing Site Allocations DPD will include sites for gypsies and travellers as set out in the Regulation 18 statement.
Stephen Bowley Planning Consultancy	I assume there will be a 'call for sites' at some stage. It is not clear from the Notice.	The 2013 SHLAA includes the results of a 'Call for Sites' which was carried out in early 2013. The results of the 2013 SHLAA will form part of the evidence base for the Housing Site Allocations DPD. A copy of West Berkshire Council's SHLAA can be downloaded from the Council's website at: http://info.westberks.gov.uk/index.aspx?artic

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<p>Alison Walker of Croudace Strategic Ltd</p>	<ul style="list-style-type: none"> • Croudace has concern with the procedural stance of the Council, and in particular, the implied predetermination of the Council's strategy (and site selection) process due to insufficient time being programmed between the close of this Regulation 17 consultation period and the Council's programmed publication date of the Plan. However, it is primarily concerned with the major conflict with the NPPF in regard to, inter alia, the reliance on a Core Strategy that by virtue of its housing requirement is out of date. • The Council's contention that the Plan will be in conformity and consistent with the Core Strategy and as such should progress in advance of a comprehensive review through the preparation of a Local Plan is, in Croudace's view, seriously flawed. • Fundamentally, the Plan based on the Core Strategy overall housing provision (10,500 new dwellings during the period 2006-2026), which even at the point of adoption was acknowledged to be based on out-of-date evidence and to fall significantly short of the full objectively assessed housing needs of the district, leave alone the wider housing market area, cannot be considered sound. • Croudace consider that the objectively assessed housing need for the District for the period 2006-2026 is in excess of 16,000 dwellings, compared with the Core Strategy housing provision of 10,500 dwellings. • None of the adopted Core Strategies covering the West Central Berkshire Housing Market Area make full provision for objectively assessed housing needs based on up-to-date evidence. (all have adopted the RSS figure) Substantial additional provision is likely to be required in order to meet in full the housing needs of the SHMA and Greater Reading in particular. • It is likely that the shortfall in the Core Strategy housing provision will exceed the shortfall of approximately 6,000 dwellings based on the objectively assessed needs of West Berkshire alone. • The West Berkshire Site Allocations DPD is being prepared on the basis of figures originally derived from the revoked South East Plan they should not be relied upon for the purposes of preparing the DPD and should not be 	<p>leid=28794</p> <p>All of the comments made through the Regulation 18 (rather than 17) consultation have been analysed and carefully considered as part of the ongoing preparatory work on the DPD to further inform its scope and content.</p> <p>Whilst the comments on process are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>In order to find the Core Strategy sound, the Inspector committed the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA) within three years of adoption of the Core Strategy DPD in order to comply with the National Planning Policy Framework (NPPF).</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing</p>

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	<p>taken as a proxy for what the DPD process, undertaken in accordance with the NPPF, may produce eventually.</p> <ul style="list-style-type: none"> In order to satisfy the tests of soundness set out in the NPPF, the West Berkshire Housing Site Allocations DPD should be prepared in accordance with Paragraph 47, which requires LPAs to boost significantly the supply of housing by using their (up-to-date) evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. Furthermore, Paragraph 182 places the emphasis firmly on the LPA to submit a plan for examination which it considers is "sound". The approach adopted by West Berkshire Council towards the preparation of its Housing Sites Allocation DPD fails on both counts. 	<p>Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need. A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF and is intended to actively encourage housing delivery. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD,</p>

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		with added flexibility including Sandford Park and windfalls.
Angela Atkinson of the Marine Management Organisation	No Comment	Noted
Bobby Gulzar	I am very keen on pushing for development for homes around areas which have close access to main trunk roads and train stations plus bus stops and how we can improve public transport to support these new homes, e.g. Aldermaston Train Station, a nice area to continue to develop and also Beenham which is a strategically placed village.	The Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD. Policy ADPP1 of the Core Strategy, states that the majority of development will be located in the main urban areas of the district. In addition, most development will be located within or adjacent to the settlements included in the settlement hierarchy of this policy. The spatial strategy for the District will be reviewed through the subsequent Local Plan.
Catherine Mason of Savills on behalf of W. Cumber and Son (Theale) Ltd	<ul style="list-style-type: none"> • As a general comment, we do not understand the reason for the change in emphasis away from a Site Allocations Document to a Housing Site Allocations Document. We are concerned that the latter will result in ambiguity about the appropriateness of other uses within the broad location for development identified in the Core Strategy. It is unclear whether there will be subsequent site allocations documents to deal with other uses. • It is therefore important that any site allocation document recognises and makes reference to complementary uses which will be considered as part of a mixed use scheme to ensure that other appropriate uses are not precluded on suitable sites. 	<p>The change in approach from a Site Allocations and Delivery DPD to a Housing Site Allocations DPD was taken in order to prioritise and encourage housing delivery in the District in accordance with Government policy. There is also a pressing requirement to address through the plan led system the need for gypsy and traveller pitches, and the need for a priority review of several housing development management policies.</p> <p>After 2016, as set out in the Council's adopted Local Development Scheme (LDS), a new Local Plan will be produced which will supersede, in December 2018, the Core</p>

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	<p>It is our view that sites EUA025, EUA026 and THE005 should be allocated for housing (and where appropriate supporting mixed use development - this applies more to sites THE005 and EUA025).</p>	<p>Strategy DPD and the Housing Site Allocations DPD. The new Local Plan will include allocations for a range of land uses.</p> <p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>
<p>Barry Mangan of Savills on behalf of Mrs. Clare Mangan</p>	<p>The Housing Site Allocations DPD provides the opportunity for the Council to review the existing defined settlement boundaries across the District. This process should be duly undertaken by the Council in order that such boundaries are accurately defined to reflect the development form of the smaller settlements and allow for organic growth where this may be appropriate and in keeping with the character of such settlements.</p>	<p>A settlement boundary review of the settlements identified within adopted Core Strategy DPD policy ADPP1 (Spatial Strategy) will be carried out as part of the Housing Site Allocations DPD. Criteria for the review are proposed to be included as part of the preferred options consultation. A review of the remaining settlement boundaries will be completed as part of work on the new Local Plan that will supersede the Core Strategy DPD and Housing Site Allocations DPD in 2018.</p>
<p>Nick Stafford for David Lock Associates</p>	<p>Given the inevitable extensive timescales and possible delays for producing a new Local Plan, it is possible that out of date saved policies will continue to persist for several years to come. We would request that West Berkshire review the scope of this document, widening its influence to include a consideration of employment sites.</p>	<p>A review of Protected Employment Areas will take place during the development of the Council's new Local Plan, which is expected to be adopted in December 2018. The new Local Plan will supersede the Core Strategy DPD and Housing Site Allocations DPD upon adoption.</p>
<p>Chris Trigwell on behalf of Kintbury Parish Council</p>	<ul style="list-style-type: none"> The Council strongly holds the view that a number of developments over and above the previous LDF have been given consent and have been built in Kintbury. These additional 143 units should be taken into account when consideration is being given to allocation of development in Kintbury and there should, therefore, be no further development permitted under the 	<p>The Housing Site Allocations DPD will take into account the level of previous years completed and permitted development within the plan period. The West Berkshire Core Strategy has allocated up to 2,000</p>

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	<p>DPD currently under consideration.</p> <ul style="list-style-type: none"> • The Council holds this view because all of the proposals that have been included in the SHLAA will contribute further to the difficulties already experienced by Kintbury Residents in relation to the current street network. • The Parish Council considers that as the Village is located in the heart of the AONB, it means that any development opportunities, particularly outside of the current Village Envelope, are bound to be deleterious to the natural beauty of the landscape and must, therefore, be avoided if the Core Strategy is to be complied with. • The Core Strategy further states that Service Villages within the AONB are expected to only contribute by way of limited development and the Parish Council sees no merit in any of the proposed sites shown in the SHLAA. 	<p>dwelling to be built within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), as a whole, between 2006 and 2026 and allocations will be made in accordance with the settlement hierarchy set out in the adopted Core Strategy. This includes Kintbury as a service village.</p> <p>The conservation and enhancement of the natural beauty of the landscape will be the paramount consideration when assessing potential sites in the AONB.</p>
	<ul style="list-style-type: none"> • The existing services within the village, particularly the Doctors Surgery, cannot cope with any more development. • The direct rail link to Paddington is under threat with the electrification of the line to Newbury. If this line were to close it would increase the number of cars on local roads, as commuters travel by car to the nearest regular fast rail service. 	<p>The Council produces and regularly updates an Infrastructure Delivery Plan (IDP) in consultation with infrastructure providers. The purpose of the IDP is to help deliver West Berkshire's future growth sustainably. It describes what infrastructure is needed and how, when and by whom it will be delivered and, where known, the location. It is proposed that the IDP will be updated as part of work on the Housing Site Allocations DPD once the sites for allocation have been confirmed.</p>
<p>Linda Currie on behalf of Oxfordshire County Council</p>	<p>Oxfordshire County Council will work jointly with West Berkshire Council to ensure the following issues are taken into account in the preparation of this DPD:</p> <p>Management of any cross-boundary movement of schools pupils:</p> <ul style="list-style-type: none"> • Due to the existing tightness of school capacity on the Oxfordshire side of the Goring/Streatley and Whitchurch/Pangbourne border, shared information about likely future pressures in this area would be useful. 	<p>Comments noted. West Berkshire will work with neighbouring authorities on an ongoing basis to provide appropriate infrastructure to meet the growth requirements of the District.</p>

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	<ul style="list-style-type: none"> • Future availability of spaces at King Alfred's to non-catchment children will depend on the changing balance between a locally growing population, King Alfred's site development plans, and new capacity planned at Grove. Information about expected population growth in the Pangbourne/Purley area of West Berks would be of use in helping Langtree plan their future capacity. • Information about expected population growth in the Compton area of West Berks would be of use in helping alternative schools to plan their future capacity. <p>Scope for Improving Bus Services between West Berks growth settlements and Oxfordshire:</p> <ul style="list-style-type: none"> • The County Council would like to explore with WBC opportunities to secure improvements to public transport services between West Berkshire and Science Vale as part of an overall bus strategy for Oxfordshire. 	
Nigel Hawkey of Touchstone	No allocations are proposed for villages not listed in the settlement hierarchy. This is despite fact that infill and rural exceptions sites in these settlements could be significant additional sources of housing supply. The scope of the document should be widened to recognise this possibility.	<p>The Housing Site Allocations DPD will form part of the Local Plan alongside the Core Strategy DPD and will be prepared within the framework of the Core Strategy. The Core Strategy in policy ADPP1 sets out the spatial strategy for the district (identifying a settlement hierarchy and housing requirement) and allocates strategic sites (sites of 500 dwellings or more). The Housing Site Allocations DPD will therefore allocate the remainder of the 'at least' 10,500 housing figure identified in the Core Strategy in and around the settlements of the district's settlement hierarchy.</p> <p>In establishing how much housing is still required of the 'at least' 10,500, a windfall allowance has been included.</p>

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		<p>After 2016, a new Local Plan will be produced which will supersede, in December 2018, the Core Strategy DPD and the Housing Site Allocations DPD. The new Local Plan will include a new housing number and will reconsider, amongst other things, the spatial strategy and the settlement hierarchy.</p> <p>It is intended to include within the DPD a policy to guide rural exceptions housing. Infill development in settlements outside the settlement hierarchy is managed through the development management process and will form part of the windfall allowance.</p>
<p>Pro Vision Planning and Design on behalf of David Wilson Homes Southern and Rivar Ltd</p>	<p>At the understanding of Pro Vision, the scope of the DPD will be limited to allocating sufficient non-strategic housing sites to meet the residual housing requirement based on the overall housing requirement set out in the Core Strategy. Based on the Council's figures, that requirement is said to be 2,718 dwellings across the District.</p>	<p>It is intended that the scope of the Housing Site Allocations DPD will also include housing related development management policies, revised parking standards for residential development and sites for gypsies and travellers.</p> <p>The requirement at March 2013 was 2,718 dwellings.</p>
	<p>Adopted LDS (September 2013) has not been updated. The revised LDS timetable (May 2014) indicates that after 2016, a new Local Plan will be produced that that will replace in 2018 the adopted Core Strategy. The preparation of the new Local Plan will include a review of the housing requirement informed by a new Strategic Housing Market Assessment.</p>	<p>The LDS was updated in May 2014 and is included on the Council's website: http://www.westberks.gov.uk/lfs.</p>
	<p>Based on past performance, the timetable for the preparation of the DPD and</p>	<p>Since the Housing Site Allocations DPD will</p>

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	<p>subsequent Local Plan is unrealistically optimistic.</p>	<p>be prepared within the framework of the adopted Core Strategy DPD (a regulatory requirement), the Housing Site Allocations DPD will be more limited in scope and content (the Core Strategy DPD sets out the spatial strategy, policy framework and housing requirement). The process to prepare the DPD is therefore shorter than that of the Core Strategy DPD.</p>
	<ul style="list-style-type: none"> • Limiting the scope of the DPD and the time taken to prepare a new Local Plan will mean that the updated housing requirement to meet the objectively assessed needs of the District will not be in place before 2019/20. The Council's assessment of housing land supply will therefore for 14 years have been based on a demonstrably inadequate requirement. This is contrary to the requirements of the NPPF. • The level of housing proposed in the Core Strategy was of concern to the Inspector who sought to reconcile this dilemma by finding the plan sound provided the overall housing requirement reviewed at an early stage. But the Core Strategy's housing requirement does not meet Objectively Assessed need (OAN). • That may have been a position that was acceptable (as the Inspector ultimately found) during a short interim period pending an early review, but not acceptable for this situation to be maintained for a longer period of time. • It was not the Inspector's intention that the Core Strategy should remain part of the Development Plan and be used as the basis for assessing land supply and preparing further site allocation DPD's for periods of 14 years. • The Site Allocations DPD process is fundamentally flawed. It should not be predicted on housing numbers which are set out in a Core Strategy which, whilst adopted in 2012, is based on the South East Plan which dates back to 2009 (using 2006 based population forecasts). The Core Strategy Inspector said those figures need early review. • It is completely misguided to continue with a Site Allocations process which 	<p>Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF (paragraph 157) and is intended to actively encourage housing delivery.</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to</p>

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	<p>will be out of date prior to adoption. A prudent and well directed council should concentrate on the review of the Core Strategy, and in particular on establishing the full OAN for market and affordable housing (as required by paragraph 47 of the NPPF) and should not pursue the site allocations process until that has been done.</p>	<p>cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need in a two stage approach, to encourage housebuilding in accordance with Government policy.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system.</p>
<p>Pro Vision Planning and Design on behalf of Benham Estate</p>	<p>At the understanding of Pro Vision, the scope of the DPD will be limited to allocating sufficient non-strategic housing sites to meet the residual housing requirement based on the overall housing requirement set out in the Core Strategy. Based on the Council's figures, that requirement is said to be 2,718 dwellings across the District.</p>	<p>The scope of DPD will also include housing related development management policies, revised parking standards for residential development and sites for gypsies and travellers.</p> <p>The requirement at March 2013 was 2,718 dwellings.</p>

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	<p>Adopted LDS (September 2013) has not been updated. The revised LDS timetable (May 2014) indicates that after 2016, a new Local Plan will be produced that that will replace in 2018 the adopted Core Strategy. The preparation of the new Local Plan will include a review of the housing requirement informed by a new Strategic Housing Market Assessment.</p>	<p>The LDS was updated in May 2014 and is included on the Council's website: http://www.westberks.gov.uk/lds.</p>
	<p>Based on past performance, the timetable for the preparation of the DPD and subsequent Local Plan is unrealistically optimistic.</p>	<p>The Regulation 18 consultation relates to the scope and content of the DPD rather than the timescales for preparation. However, in response, because the Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD (a regulatory requirement), the scope of the DPD will be more limited in scope and content (the Core Strategy DPD sets out the spatial strategy, policy framework and housing requirement). The process to prepare the DPD is therefore shorter than that of the Core Strategy DPD.</p> <p>Furthermore, evidence work to inform the preparation of the Housing Sites Allocations DPD is well progressed.</p>
	<ul style="list-style-type: none"> • Limiting the scope of the DPD and the time taken to prepare a new Local Plan will mean that the updated housing requirement to meet the objectively assessed needs of the District will not be in place before 2019/20. The Council's assessment of housing land supply will therefore for 14 years have been based on a demonstrably inadequate requirement. This is contrary to the requirements of the NPPF. • The level of housing proposed in the Core Strategy was of concern to the Inspector who sought to reconcile this dilemma by finding the plan sound provided the overall housing requirement reviewed at an early stage. But the Core Strategy's housing requirement does not meet Objectively Assessed need (OAN). 	<p>Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance</p>

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	<ul style="list-style-type: none"> • That may have been a position that was acceptable (as the Inspector ultimately found) during a short interim period pending an early review, but not acceptable for this situation to be maintained for a longer period of time. • It was not the Inspector's intention that the Core Strategy should remain part of the Development Plan and be used as the basis for assessing land supply and preparing further site allocation DPD's for periods of 14 years. • The Site Allocations DPD process is fundamentally flawed. It should not be predicted on housing numbers which are set out in a Core Strategy which, whilst adopted in 2012, is based on the South East Plan which dates back to 2009 (using 2006 based population forecasts). The Core Strategy Inspector said those figures need early review. • It is completely misguided to continue with a Site Allocations process which will be out of date prior to adoption. A prudent and well directed council should concentrate on the review of the Core Strategy, and in particular on establishing the full OAN for market and affordable housing (as required by paragraph 47 of the NPPF) and should not pursue the site allocations process until that has been done. 	<p>with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF (paragraph 157) and is intended to actively encourage housing delivery.</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively</p>

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		assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.
Pro Vision Planning and Design on behalf of Banner Homes and Wates	At the understanding of Pro Vision, the scope of the DPD will be limited to allocating sufficient non-strategic housing sites to meet the residual housing requirement based on the overall housing requirement set out in the Core Strategy. Based on the Council's figures, that requirement is said to be 2,718 dwellings across the District.	The scope of DPD will also include housing related development management policies, revised parking standards for residential development and sites for gypsies and travellers. The requirement at March 2013 was 2,718 dwellings.
	Adopted LDS (September 2013) has not been updated. The revised LDS timetable (May 2014) indicates that after 2016, a new Local Plan will be produced that that will replace in 2018 the adopted Core Strategy. The preparation of the new Local Plan will include a review of the housing requirement informed by a new Strategic Housing Market Assessment.	The LDS was updated in May 2014 and is included on the Council's website: http://www.westberks.gov.uk/lfs .
	Based on past performance, the timetable for the preparation of the DPD and subsequent Local Plan is unrealistically optimistic.	The Regulation 18 consultation relates to the scope and content of the DPD rather than the timescales for preparation. However, in response, because the Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD (a regulatory requirement), the Housing Site Allocations DPD will be more limited in scope and content (the Core Strategy DPD sets out the spatial strategy, policy framework and housing requirement). The process to prepare the DPD is therefore shorter than that of the Core Strategy DPD.
	<ul style="list-style-type: none"> Limiting the scope of the DPD and the time taken to prepare a new Local Plan will mean that the updated housing requirement to meet the objectively assessed needs of the District will not be in place before 	Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to

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	<p>2019/20. The Council's assessment of housing land supply will therefore for 14 years have been based on a demonstrably inadequate requirement. This is contrary to the requirements of the NPPF.</p> <ul style="list-style-type: none"> • The level of housing proposed in the Core Strategy was of concern to the Inspector who sought to reconcile this dilemma by finding the plan sound provided the overall housing requirement reviewed at an early stage. But the Core Strategy's housing requirement does not meet Objectively Assessed need (OAN). • That may have been a position that was acceptable (as the Inspector ultimately found) during a short interim period pending an early review, but not acceptable for this situation to be maintained for a longer period of time. • It was not the Inspector's intention that the Core Strategy should remain part of the Development Plan and be used as the basis for assessing land supply and preparing further site allocation DPD's for periods of 14 years. • The Site Allocations DPD process is fundamentally flawed. It should not be predicted on housing numbers which are set out in a Core Strategy which, whilst adopted in 2012, is based on the South East Plan which dates back to 2009 (using 2006 based population forecasts). The Core Strategy Inspector said those figures need early review. • It is completely misguided to continue with a Site Allocations process which will be out of date prior to adoption. A prudent and well directed council should concentrate on the review of the Core Strategy, and in particular on establishing the full OAN for market and affordable housing (as required by paragraph 47 of the NPPF) and should not pursue the site allocations process until that has been done. 	<p>progressing housing allocations in the District. The position is therefore explained below:</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF (paragraph 157) and is intended to actively encourage housing delivery.</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to</p>

Respondent	Summary of Representation	Council's response
		<p>include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.</p>
<p>Sarah Griffiths of Turley on behalf of Commercial Estates Group</p>	<p>West Berkshire cannot currently demonstrate a deliverable five year housing land supply. This has been exacerbated by the delay in bringing forward Sandford Park. It is therefore recommended that West Berkshire should identify some of the sites shortlisted in the 'preferred options' version of the DPD as appropriate to address this shortfall in the short term.</p>	<p>A five year housing land supply can be clearly demonstrated. The five year housing land supply is set out in the Council's document 'Five year housing land supply at December 2013': http://info.westberks.gov.uk/CHttpHandler.ashx?id=35805&p=0 It is not therefore proposed to take the suggested approach.</p>
	<p>Other local authorities have sought through regular monitoring, to overcome interim shortages in housing land supply by adopting additional interim housing policies and sites. This allows for new development to come forward in the 5 year period. West Berkshire should be keen to promote additional housing and recognise the benefits of sustainable growth of settlements and the role this can play in the economic prosperity of West Berkshire.</p>	<p>Progressing a Housing Site Allocations DPD will be a proactive approach and is intended to actively encourage housing delivery. This will ensure that non strategic sites can be allocated thus maintaining the Council's five year housing land supply.</p> <p>Interim housing policies carry very little weight unless they have been subject to the correct preparatory processes as part of a DPD.</p>

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	<p>The focus should be on sustainable sites in and around Newbury, as the principal settlement of West Berkshire, and in part compensation for the delay in delivery of the Sandford Park urban extension. Local Authorities who depend on the delivery of substantial urban extensions for their housing supply often find such large scale releases of housing land can take much longer to come forward than anticipated. This issue should be suitably addressed through the identification now of other sites in Newbury.</p>	<p>The Housing Site Allocations DPD will allocate the remainder of the 'at least' 10,500 housing figure identified in the Core Strategy in and around the settlements of the district's settlement hierarchy in accordance with the spatial strategy. The Core Strategy sets out the settlement hierarchy in policy ADPP1. This policy acknowledges that West Berkshire's main urban areas, such as Newbury, will be the focus for development and policy ADPP2 sets out the details of the spatial strategy for this area.</p> <p>The site selection work for the Housing Site Allocations DPD is subject to a Sustainability Appraisal / Strategic Environmental Assessment. This, alongside technical advice, will ensure that the sites taken forward into the Preferred Options Housing Site Allocations DPD document are sustainable. The site selection criteria will be based on the principles of sustainability.</p>
	<p>As part of the Housing Site Allocations DPD consultation Commercial Estates Group will write again to further promote their site on land at North Newbury as a suitable and sustainable location, to help deliver the remainder of the Core Strategy housing requirement.</p>	<p>Comment noted.</p>

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Charles Routh of Natural England	<p>There are a number of environmental assets in or liable to be affected by the plan which need to be considered in the plan making process. These include European Sites, Sites of Special Scientific Interest, the North Wessex Downs AONB, and more locally determined features of wildlife and landscape value. If locally assessed needs are undeliverable in the context of paragraph 14 of the NPPF, there should be early engagement with neighbouring planning authorities to seek to meet these needs elsewhere. We expect that any allocations are demonstrated to be deliverable in the context of the NPPF and local policies to protect the natural environment. In particular we advise that the plan shows that policies will not result in unacceptable impacts on protected landscapes and that priority species and habitats will not fundamentally constrain development on the sites chosen.</p>	<p>The Housing Site Allocations DPD will be prepared within the context of the Core Strategy DPD. Policy CS17 of the Core Strategy has specific regard to biodiversity and geodiversity. The preparation of the Core Strategy was informed by the NPPF.</p> <p>Work on satisfying the Duty to Cooperate is taking place on an ongoing basis. A paper has been sent out to those with whom West Berkshire needs to cooperate which sets out how West Berkshire Council will deal with strategic planning issues as part of the preparation of the DPD.</p> <p>As part of the site selection process, all sites will be subject to a Sustainability Appraisal / Strategic Environmental Assessment. The detailed site selection criteria will also take the specific matters raised into account – they are integral to the site selection process.</p>
	<p>The Sustainability Appraisal process should be initiated at an early stage in the process and should ensure that the 'avoid – mitigate – compensate' hierarchy is adhered to and a net gain for the environment should be sought.</p>	<p>A Sustainability Appraisal / Strategic Environmental Assessment Scoping Report has been prepared and consulted upon for the Housing Site Allocations DPD. In line with the Environmental Assessment of Plans and Programmes Regulations 2004, Natural England has been consulted as one of the 'consultation bodies'. SA/SEA is an integral part of the preparation of the DPD and will be used throughout as part of the assessment of the sites.</p>
	<p>A Habitats Regulation Assessment should be undertaken and initiated at an</p>	<p>A Habitats Regulation Assessment</p>

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	<p>early stage.</p> <p>If the DPD includes development specifications, we advise that the natural environment is included in these specifications, and where appropriate, justified by evidence such as landscape assessment.</p> <p>More general advice is set out in the annex appended to the representation letter.</p>	<p>Screening Report is being drafted and will be updated as preferred sites and policies evolve. In line with the Conservation of Habitats and Species Regulations 2010, Natural England will be consulted on this document as it is the 'appropriate nature conservation body'.</p> <p>Comment noted. The DPD will include policies for each allocation.</p> <p>Advice set out in Annex noted.</p>
David Fisher	<p>I think it is essential that adequate land be allocated to housing to allow for development both inside and outside the respective village boundaries where allocation of such land will not harm either the local or social environment of the region surrounding it.</p>	<p>The Housing Site Allocations DPD will allocate the remaining 'at least' 10,500 dwelling requirement identified in the Core Strategy DPD. Development will be located within or adjacent to the settlements identified in the settlement hierarchy (in policy ADPP1) of the Core Strategy DPD.</p>
David Russell	<p>If current planning policies and trends persist in the foreseeable future, Inkpen will become a collection of big to huge houses, with the distribution so skewed to the 5+ bedroom house category that it will feel like the gated communities.</p> <p>Driven by the reasonable wish to preserve the character of Inkpen and surrounds, the current generation of Inkpen residents seems to have given themselves the right to freeze the footprint of the village as it was in the 1990s. This is massively ironic because, of course, most of these people live in houses which were built on land that was split from other, larger plots.</p> <p>West Berkshire should challenge the smaller communities who currently have no responsibility under the core plan to supply any sites for building new houses. They should be asked to take some responsibility and come up with suggestions that would support the healthy development of their village and supply new houses.</p>	<p>The adopted Core Strategy DPD includes a policy on housing type and mix (policy CS4). The new Local Plan, that will supersede both the Core Strategy and Housing Site Allocations DPD in 2018, will include a review of all Core Strategy DPD and Housing Site Allocation DPD policies, in addition to any of the remaining saved Local Plan policies. The evidence base will also be reviewed.</p> <p>Whilst Inkpen falls outside of the settlement hierarchy set out within policy ADPP1 of the Core Strategy DPD, the new Local Plan will include a review of the settlement hierarchy.</p>

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<p>Douglas Bond of WoolfBond Planning</p>	<p>That overall housing requirement as set out in the core strategy is "out of date" having regard to the more recent advice in the NPPF and reinforced by the recent publication of the PPG. This guidance points to having an up-to-date housing requirement based on the most up-to-date objectively assessed needs.</p>	<p>In order to find the Core Strategy sound, the Inspector committed the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA) within three years of adoption of the Core Strategy DPD in order to comply with the National Planning Policy Framework (NPPF).</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the</p>

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		<p>Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in accordance with Government policy.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandlesford Park and windfalls.</p>
Hannah Wilson of Wokingham Borough Council	No Comment	
Graham Hunt of Newbury Town Council	<p>The general consensus was that a Housing Site Allocation document on its own, without reference to the resulting infrastructure needs is potentially dangerous. The scope and content of the Housing Site Allocations Development Plan Document (DPD) should therefore include as integral elements:</p> <ul style="list-style-type: none"> • Retention of the housing mix foreseen in the Core Strategy. • The schools, primary health care services, public transport, roads, and road developments required for the new houses. 	<p>The Housing Site Allocations DPD will form part of the Local Plan alongside the Core Strategy DPD. It will consequently be in general conformity with the Core Strategy.</p> <p>Future infrastructure requirements are listed within the Council's Infrastructure Delivery Plan (IDP). The purpose of the IDP is to help deliver West Berkshire's future growth</p>

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	<ul style="list-style-type: none"> • Retention of the balance foreseen in the Core Strategy between the growth of residential, retail, commercial, and industrial areas. • Wider consideration of the eventual needs of the Newbury/Thatcham conurbation, including the urban areas of adjoining parishes. • The space which may eventually be assigned to a University or University faculties, a modern concert hall, and a modern sports complex. • Provision for the wider transport needs of the Newbury/Thatcham conurbation, including completing an outer ring road to the south and north. • Bringing the A339 Newbury-Basingstoke road to an acceptable standard for future needs. 	<p>sustainably. It describes what infrastructure is needed and how, when and by whom it will be delivered and, where known, the location. The IDP will be updated as part of work on the Housing Site Allocations DPD in consultation with infrastructure providers, and will be updated as part of work on the Housing Site Allocations DPD once preferred housing sites have been confirmed as firm allocations.</p>
<p>Peter Dutton of Gladman Developments (submission includes Appendix A: location plan and Appendix B: Paul Tucker QC legal opinion)</p>	<p>Core Strategy review:</p> <ul style="list-style-type: none"> • The NPPF sets out at paragraphs 14, 47, 152 and 159 the need to prepare a Strategic Housing Market Assessment as the basis for determining an authority's objectively assessed housing needs and to meet these needs in full. • At examination, the Core Strategy Inspector highlighted that the proposed housing target for the district did not meet with the requirements of the Framework, with the available evidence indicating housing need and demand to be higher than the level of the homes proposed. Based on these conclusions, the Core Strategy sets out that the Council will prepare an updated SHMA within three years of the Plan's adoption, undertaking a review of the housing targets for the district based on the SHMA's findings. • Gladman remind the Council of the fundamental need to review the current housing requirements for the district to ensure that these are consistent with the authority's full objectively assessed needs. This is particularly the case where evidence points to the need to provide a significantly higher level of homes in the district with the 2008 and 2011 household projections indicating the need to provide 796 and 710 dwellings per annum in the authority area. 	<p>The High Court cases that the respondent refers to are noted. However the comments made appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below:</p> <p>Work has commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need.</p>

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		<p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandford Park and windfalls.</p>
	<p>In light of a lack of NPPF compliant assessment of West Berkshire's housing needs, Gladman have commissioned Regeneris Consulting to undertake an independent objective assessment of the district's housing needs. The draft</p>	<p>West Berkshire Council has commenced work on a SHMA in conjunction with the neighbouring Berkshire authorities. In</p>

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	<p>assessment indicates that there is now a need to deliver 1,080 dwellings per annum in West Berkshire over the period 2011-2026, more than double the housing requirement currently set out in the Council's adopted Core Strategy. This highlights a significant need to identify further deliverable and developable housing sites in the district.</p>	<p>accordance with the NPPF, the SHMA will be carried out for the Housing Market Area rather than for the West Berkshire area. It does not appear from the respondent's comments that the draft assessment by Regeneris Consulting has taken into account neighbouring authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will also need to be involved in accordance with the duty to cooperate. The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need and is intended to actively encourage housing delivery.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations DPD and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system in a two stage approach, to encourage housebuilding in</p>

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		<p>accordance with Government policy.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF.</p>
	<p>Core Strategy review:</p> <ul style="list-style-type: none"> • Whilst recognising that the Council is currently in the process of preparing an up-to-date SHMA and intends to commence work on a new Local Plan once the Housing Site Allocations DPD has been adopted, Gladman submit that it would now be appropriate for the Council to delay work on the Housing Site Allocations DPD with a view to progressing a combined Local Plan and Site Allocations document, in conformity with the Framework's requirements. To be found sound and consistent with the Framework's requirements, the Housing Site Allocations DPD must identify sufficient housing sites to meet the full objectively assessed needs for the district • To be found sound and consistent with the NPPF, the Housing Site Allocations DPD must identify sufficient housing sites to meet the full objectively assessed needs for the district, with the amount of weight to be given to the Core Strategy Housing targets viewed in the context of paragraph 215 of the Framework. A copy of a legal opinion on this matter, prepared by Paul Tucker QC for the recent Harrogate Sites and Policies DPD Examination, is provided at Appendix B of this submission in this regard. 	<p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF (paragraph 157) and is intended to actively encourage housing delivery. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandlesford Park and windfalls.</p>
	<p>Site allocations:</p>	<p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than</p>

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	<ul style="list-style-type: none"> ● NPPF makes clear that to significantly boost the supply of housing, Local Planning Authorities should identify and update annually a supply of specific sites sufficient to supply five years' worth of housing with either a 5% or 20% buffer dependent on past delivery; and use their evidence base to ensure they meet their full objectively assessed housing needs, Identify a supply of specific developable sites, or broad locations for growth for years 6-10, and where possible 11-15 of the Plan period. ● The Housing Site Allocations DPD will help to deliver the housing required in West Berkshire over the Plan period. To ensure this is achieved Gladman submit that the Plan should distribute housing to a range of sites that will support the Plan's strategy, provide sustainable locations for development and ensure housing is delivered. To address situations where housing does not come forward as expected it should make clear that the authority will seek to maintain at all times a five year supply of deliverable housing sites in accordance with the Presumption in Favour of Sustainable Development ● Often, Plan allocations do not deliver the level of housing that was anticipated when they were allocated. There should be an over-allocation of sites, over and above the housing required by the Core Strategy, to cater for sites that fail to come forward, come forward at a slower rate than originally anticipated, or do not deliver the number of dwellings originally considered appropriate. ● NPPF emphasises that the purpose of the planning system is to contribute to the achievement of sustainable development. The Council should therefore distribute growth to sustainable settlements with established facilities, services and infrastructure. However, the need for development in lower order sustainable settlements, which could also help to sustain existing facilities and services, should not be overlooked. The level of housing directed to each of the district's settlements should be viewed in the context of the authority's full, objectively assessed needs. ● The decision to distribute development and allocate sites should be based on the findings of the evidence base and should not be a politically driven spatial strategy. The Council should seek to provide sufficient growth to 	<p>wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF and is intended to actively encourage housing delivery. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandford Park and windfalls.</p>

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	<p>meet the needs of its settlements taking their sustainability credentials and the need to ensure their long-term vitality into account.</p> <p>Site submission:</p> <ul style="list-style-type: none"> • Gladman have an interest in Land off Mans Hill, Burghfield Common, as shown in Appendix A to this submission. • Gladman submit that Burghfield Common represents a sustainable location for further residential development. Defined as one of the districts Rural Service Centres to which further development will be directed, the village benefits from a good range of services and facilities, with frequent public transport links to the higher order centre of Reading. • Land off Mans Hill provides an inherently suitable and sustainable location for residential development. The site could be sympathetically developed to provide a logical extension to the settlement, reflecting the characteristics and setting of its location. There are no significant constraints or designations that would prevent the site from coming forward in the short term to meet the authority's housing needs. • Land off Mans Hill is considered to be deliverable, as it is available now, offers a suitable location for development, and is achievable. The landowner and Gladman are keen to deliver a high quality scheme on the site and would welcome further discussions with the Council regarding this. 	<p>The distribution and allocation of sites within the Housing Site Allocations DPD will be in line with the spatial strategy and settlement hierarchy set out in policy ADPP1 of the Core Strategy DPD. The spatial strategy reflects the existing and future role and function of settlements.</p> <p>The comments on Mans Hill are noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>
<p>Oliver Taylor of Strutt and Parker LLP on behalf of James Radbourne (attachments: Appendix A: site location plan and Appendix B: Landscape</p>	<p>Summary and conclusion:</p> <p>Presumption in favour of sustainable development at heart of NPPF. Local Planning Authorities must positively seek opportunities to meet development needs of their area.</p> <p>Preferred locations for new housing development should be identified across each of the identified rural service centres and rural service villages.</p>	<p>The Housing Site Allocations DPD will proactively allocate non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF.</p> <p>The Housing Site Allocations DPD will allocate the remainder of the 'at least' 10,500 housing figure identified in the Core Strategy in and around the settlements of the district's settlement hierarchy in accordance with the spatial strategy. The</p>

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and Visual Assessment)		Core Strategy sets out the settlement hierarchy in policy ADPP1. This policy acknowledges that West Berkshire's main urban areas, such as Newbury, will be the focus for development with further development opportunities in rural service centres and service villages.
	<ul style="list-style-type: none"> • The DPD should be structured in four parts – Part I should provide an introduction and set out how West Berkshire has proactively sought to meet its objectively assessed housing needs. Parts II and III should establish a growth and distribution strategy for the identified Rural Service Centres and Service Villages respectively. Each part should then be broken down into a strategy for each settlement and should identify individual sites for housing allocations. Part IV should contain provisions relating to housing related development management policies, inclusive of those to manage development in the open countryside. • Parts II to III should identify sufficient land to meet the Council's objectively assessed housing need having regard to the awaited SHMA. 	Comments noted. It is proposed that the DPD will include this information but will not repeat details already included within the adopted Core Strategy.
	<ul style="list-style-type: none"> • Land at Wantage Road should be allocated for residential development in the Preferred Options draft of the Housing Site Allocations DPD. The site is readily available and title absolute is in single ownership. There are no insurmountable legal issues preventing this site from coming forward and delivering much need new open market and affordable housing. • Representations supported by a Landscape and Visual Assessment 	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.
Barbara Morgan of Network Rail	<p>Developer contributions:</p> <ul style="list-style-type: none"> • The DPD should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure. • Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car 	<p>The Housing Site Allocations DPD will be prepared within the framework of the adopted Core Strategy DPD which includes strategic policies. The Housing Site Allocations DPD will therefore not include a policy on developer contributions.</p> <p>Policy CS5 of the Core Strategy has regard to infrastructure requirements and delivery</p>

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	<p>parking, improved access arrangements or platform extensions.</p> <ul style="list-style-type: none"> ● Network Rail is a publicly funded organisation with a regulated remit. It would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. ● Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development. ● The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network. ● To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following: <ul style="list-style-type: none"> ○ A requirement for development contributions to deliver improvements to the rail network where appropriate. ○ A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. <p>A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.</p>	<p>and states that the Council will work with infrastructure providers and stakeholders to identify requirements for infrastructure provision and services for new development and will seek to co-ordinate infrastructure delivery, whilst protecting local amenities and environmental quality Network Rail, as a key infrastructure provider, will be consulted regarding further infrastructure requirements resulting from shortlisted site allocations..</p> <p>It should be noted that from 1 April 2015, the Community Infrastructure Levy (CIL) will come into force (and apply to all planning permissions granted on or after 1 April 2015) and will replace the contributions collected under Section 106 with the exception of affordable housing.</p> <p>The generic types of infrastructure that may be funded with CIL receipts is set out in the Reg 123 List which accompanies the Council's CIL Charging Schedule. There are however exceptions, those being specific on-site infrastructure or direct mitigation measures required as a result of any large scale development.</p> <p>Further updates to the Reg 123 list will be made on an annual basis and will have regard to amongst other things, the Council's Infrastructure Delivery Plan (which will be updated as part of work on the DPD).</p>

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	<p>Level crossing safety:</p> <ul style="list-style-type: none"> • Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. • As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. Therefore the location of proposed housing sites is an important consideration for Network Rail. • In this regard, we would request that the potential impacts from residential development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. • We request that a policy is provided confirming that: <ul style="list-style-type: none"> ○ the Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (<i>Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate</i> 	<p>Network Rail will be consulted upon this, as they have been on previous updates to the IDP).</p> <p>It is intended that the Housing Site Allocations DPD will include detailed policies for each of the housing allocations. It is advised that during the forthcoming Preferred Options consultation on the DPD, Network Rail highlight any sites that could have an impact upon the safety of level crossings.</p>

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	<p><i>approval</i>”).</p> <ul style="list-style-type: none"> ○ Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and ○ The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. 	
	<p>Other considerations:</p> <ul style="list-style-type: none"> • Any traveller site is deemed the same as any residential development next to the operational railway with potentially increased numbers of young people and minors using the site, there is an increased risk of trespass with residents using the railway as a short cut and failing to recognise the risks involved by crossing the railway at unauthorised points. • Any existing Network Rail fencing at any potential site which is next to the operational railway has been erected to take account of the risk posed at the time the fencing was constructed and not to take into account any presumed future use of the site. • Therefore, any proposed residential traveller development site may import additional trespass onto the railway, therefore, should the Council chose to develop a site next to the operational railway they must provide a suitable trespass proof steel palisade fence of a minimum 1.8m in height to mitigate any risks that the development might import. • Any fencing installed must not prevent Network Rail from maintaining its own fencing/boundary treatment. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund boundary works and enhancements necessitated by commercial or third party developments that import risks onto the operational railway and Network Rail land. • There must be a minimum of a 2 metres gap between any buildings or structures and the Network Rail boundary. • We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications or proposed site allocations should they be submitted for sites adjoining the railway, or 	<p>Comments noted. These will be taken into consideration during the selection of the Gypsy and Traveller sites. It is proposed that Gypsy and Traveller sites are included within the Preferred Option draft of the Housing Site Allocations DPD. It is advised that Network Rail raise any concerns as part of the consultation.</p>

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	<p>within close proximity to the railway as we may have more specific comments to make (further to those above).</p>	
<p>Mark Williams of Vale of White Horse District Council</p>	<ul style="list-style-type: none"> • The Vale of White Horse District Council welcomes the level of work that West Berkshire Council are undertaking to identify and allocate a sufficient level of housing sites to address their future housing needs of their area, as well as maintain a five year supply of deliverable housing sites, to promote the sustainable development area. • The Council has no comments to make in relation to the proposed scope and content of the allocations document. • We would suggest that West Berkshire Council should be mindful of all of the supporting infrastructure requirements (particularly the A34) for the future allocations, in order to promote sustainable development of the area and wider sub area. 	<p>Comments noted. As part of the site selection process for the Housing Site Allocations DPD, we will liaise with the Highways Agency and the Council's Highways and Transport Team and Transport Policy Team.</p> <p>The Council has an Infrastructure Delivery Plan which is updated periodically. The IDP will be updated as part of work on the Housing Site Allocations DPD.</p>
<p>Brian Clifford of Network Rail Mining Department</p>	<ul style="list-style-type: none"> • With reference to West Berkshire Minerals and Waste Development Issues and Options Consultation. Our department's main concern is to protect the rail network from the potential risk from mineral and waste development. • I have looked through the Council documents and can find no reference to mineral extraction or landfill operations on which it is our department's role to assess and comment. Therefore, we have no recommendations or comments thereon. 	<p>The Housing Site Allocations DPD will not take into account minerals and waste. A separate Minerals and Waste DPD is being prepared and an issues and options consultation for this document ran between January and February 2014.</p>
<p>Matthew and Jane Parkin</p>	<p>As the owners of site ref CHI016 at Downend Chieveley we would like to make the following comments.</p> <ul style="list-style-type: none"> • The site of approx 0.7ha comprises a redundant/derelict garden with brick and tile workshop / outbuilding, it lies adjacent to the existing development boundary to the northern edge of the village accessed from Mophetts Lane via the original driveway to Downend Farm. Downend Farm having made a new access from the bye way at the end of Mophetts Lane during the late 1980's. • Mophetts Lane is an unadopted gravel lane serving some 8 large detached dwellings, these are family houses so the lane carries varying levels of traffic dependant on occupancy. These existing properties are and 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

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	<p>have been serviced via the lane without issue.</p> <ul style="list-style-type: none"> • Historically the site lay within the development boundary before its revision approx 28 years ago. • Any development of the site would be in keeping with the existing settlement pattern and could take place without harm to the natural beauty of the AONB. • The Kirkham landscape report concluded that development could be accommodated without negative affect providing the existing vegetation framework is retained, replacing the 'incongruous' conifer hedge with more native planting would be beneficial. • The hedge does screen the site from the surrounding countryside and forms a natural end to the northern edge of the village at this point. • Inclusion of the site within the settlement boundary would provide for a more organic form of growth to balance the larger sites which almost form a village within the village, allowing for a more cohesive society to develop. 	
<p>Greg McGill of the West Berkshire Ramblers</p>	<p>I refer to the notice of your intention to prepare the above document and would ask, in the assessment of possible impacts of new housing sites, that you consider the following:</p> <ul style="list-style-type: none"> • that the existing public and permitted footpath networks are not reduced or damaged in any way; • that where it is deemed necessary to divert any path that the diversion is no less attractive to walk along than the existing path and preferably would be an improvement; • that when looking at sites for housing you consider how the FP network could be improved by the creation of new FP links (even where none exist at present). With new housing we consider it important to maintain good links to the countryside for existing residents who may otherwise find it less attractive and/or more difficult to access footpaths and the countryside near their homes because of new housing developments; • that you consider improvements to the footpath network be made a policy requirement of the DPD and preferably incorporated into appropriate s106 	<p>Comments noted. The Council seeks to provide sustainable development, in line with the requirements of the NPPF and Core Strategy. The Council's Rights of Way Officer will be consulted, where appropriate, on development proposals which affect public rights of way. Additionally, Core Strategy policy CS14 – Design Principles, requires new development to 'Ensure environments are accessible to all and give priority to pedestrians and cycle access providing linkages and integration with surrounding uses and open spaces.'</p>

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	agreements and conditions of planning consent for new housing developments.	
Joanna Male of Gregory Gray Associates on behalf of The Garden Centre Group	Representation promotes the following sites: <ul style="list-style-type: none"> • Thatcham Garden Centre (site ref: THA023) • Hungerford Garden Centre (site ref: HUN020) 	Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.
Heidi Clarke of Sport England	<ul style="list-style-type: none"> • It appears that West Berkshire undertook a retail and leisure study in 2003 and was updated in 2010. Any sports facilities allocated in the study for protection and enhancement should be reflected in the allocation of sites for housing. Furthermore where sites are identified for housing consideration should be given to the additional demand this will put on sports facilities. Furthermore existing playing field should not be allocated for housing unless there is a robust evidence base to suggest such playing field is surplus in accordance with Paragraph 74 of the NPPF. Sport England would oppose the allocation of any playing field site for housing in accordance with Paragraph 74 of the NPPF. • West Berkshire has not undertaken a Playing Pitch Strategy which is regrettable. It is advisable that the Council consider undertaking a Playing Pitch strategy in order to take account of existing provision and ensure that there is a good supply of high quality pitches and playing fields available to the community. 	Future infrastructure requirements are listed within the Council's Infrastructure Delivery Plan (IDP). The purpose of the IDP is to help deliver West Berkshire's future growth sustainably. It describes what infrastructure is needed and how, when and by whom it will be delivered and, where known, the location. The IDP will be updated as part of work on the Housing Site Allocations DPD. The Housing Site Allocations DPD is being prepared in conformity with the Core Strategy which has already been examined and adopted, along with its evidence base. The evidence base will be reviewed as part of the preparation of a new Local Plan.
James Hicks of Pegasus Planning on behalf of Henry Davidson Developments (Burghfield)	<ul style="list-style-type: none"> • The DPD will be fundamentally flawed if it relies on the housing figure identified in the adopted West Berkshire Core Strategy. A Local Plan or DPD has to comply with the National Planning Policy Framework (NPPF) • The SHMA needs to be completed before the <i>Housing Site Allocations DPD</i> can progress. Without it, the DPD will not be able to pass the NPPF tests of soundness in policy terms or demonstrate statutory compliance with the Duty to Co-operate in Section 110 of the Localism Act 2011. • It is clear from the recent court judgments and the decisions of planning 	Whilst these comments are noted, they appear to be based on a misunderstanding of the Council's positive approach to progressing housing allocations in the District. The position is therefore explained below: In order to find the Core Strategy sound, the

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Common) Ltd	<p>inspectors, in conjunction with the report of the Inspector who examined the West Berkshire Core Strategy that the Core Strategy housing target does not comply with the NPPF even though it was adopted after publication of the NPPF.</p> <ul style="list-style-type: none"> • It follows that West Berkshire cannot demonstrate a five-year housing land supply; that the Core Strategy policies for housing cannot be considered up to date in terms of Paragraph 49 of the NPPF; and that paragraph 14 of the NPPF including the presumption in favour of sustainable development must therefore be applied to housing applications as development plan policies are out of date. • It also follows that the housing target of the Core Strategy cannot be used as the basis for a sound Housing Sites Allocation Document. The proposed DPD must follow completion of a new SHMA for the wider Berkshire housing market area: to meet the statutory Duty to Co-operate; and to comply with the policy requirements of the NPPF by demonstrating that its proposals meet the full, objectively assessed housing needs in the housing market area, as far as is consistent with other policies in the NPPF. 	<p>Inspector committed the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA) within three years of adoption of the Core Strategy DPD in order to comply with the National Planning Policy Framework (NPPF).</p> <p>Work has now commenced on a SHMA in conjunction with neighbouring Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will be involved in accordance with the duty to cooperate. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF. The Housing Site Allocations DPD will identify site allocations to meet the first proportion of the objectively assessed need and is intended to actively encourage housing delivery.</p> <p>A Local Plan will then be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District. Timetables for both the Housing Site Allocations and the Local Plan are set out in the Council's approved Local Development Scheme and demonstrate the</p>

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		<p>Council's public commitment to assessing and proactively meeting the objectively assessed needs of West Berkshire through the plan-led system.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF. This housing allocation will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy DPD, with added flexibility including Sandleford Park and windfalls.</p> <p>In respect of the Duty to Cooperate, work on satisfying the Duty is taking place on an ongoing basis. A paper has been sent out to those with whom West Berkshire needs to cooperate which sets out how West Berkshire Council will deal with strategic planning issues as part of the preparation of the DPD. The paper seeks comments on the approach as part of the ongoing process of cooperation.</p> <p>The paper identifies that the strategic priorities are already agreed within the adopted Core Strategy DPD. Since the primary role of the Housing Site Allocations</p>

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		<p>DPD will be to support the delivery of housing as set out in the Core Strategy DPD, we are therefore tailoring our approach to the Duty to Cooperate as part of the Housing Site Allocations DPD accordingly. A series of strategic matters have been drawn out from the Core Strategy DPD which the Council considers to be of particular relevance to the Housing Site Allocations DPD. Outcomes from the consultation on this paper will be reported separately as part of the Duty to Cooperate process.</p> <p>West Berkshire Council has a five year housing land supply. The five year housing land supply is set out in the Council's document 'Five year housing land supply at December 2013': http://info.westberks.gov.uk/CHttpHandler.ashx?id=35805&p=0</p>
<p>Martyn Crocker on behalf of Derek Crocker (submission includes Appendix)</p>	<p>Scope:</p> <ul style="list-style-type: none"> • WBC have not shown any intention of reviewing the settlement boundaries within this HSAPDP, we have always been informed that boundary resetting would be addressed as part of the HSAPDP • We strongly object to the exclusion of this site and the statement from the WBC Planning Policy Team that the site is not developable (which it clearly is). We suggest all the factors have not been correctly taken in to consideration. • West Berks need the housing and there are small sites that cumulatively together with other small sites would be significant in assisting in boosting the supply of housing, many in an acceptable way, and which ought not to 	<p>A settlement boundary review of the settlements identified within adopted Core Strategy DPD policy ADPP1 (Spatial Strategy) will be carried out as part of the Housing Site Allocations DPD. Criteria to review the settlement boundaries will be consulted upon as part of the preferred options consultation for the Housing Site Allocations DPD.</p> <p>A review of the remaining settlement boundaries will be completed as part of work</p>

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	<p>be excluded from consideration in identifying sites in and around sustainable settlements such as Hungerford. We consider HUN002 to be such a case.</p> <p>Case for developing the site – vehicular access:</p> <ul style="list-style-type: none"> • Formal request made for settlement boundary to be extended to Marsh Lane. Marsh Lane clearly merges with the town, with the remaining area clearly distinct and separated by hedgerows. We request this in accordance with WBC's statement 'all settlement boundaries will be reviewed through the Site Allocations and Delivery DPD'. • Vehicular access issues relating to the site can be overcome by upgrading the access. • Highways improvement plans accompanied a planning application in 2004 which was refused because of the present substandard nature of Marsh Lane and the absence of a S106 agreement. Grant of planning permission would have required highways improvements. • Application for housing in 2000 refused. Subsequent appeal dismissed. Inspector noted road safety an issue but accepted Highways Authority's view that there are ways of overcoming highways objections by providing passing places and widening the lane. • Since the 2004 application, land opposite HUN002 has been used as allotment site (over 80 plots) for past 5 years. This has generated traffic to and from the site with no problems and obviously with the approval of WBC. Traffic access to HUN002 cannot be considered an issue. <p>Rural character of the site:</p> <ul style="list-style-type: none"> • 2011 SHLAA commented that development of the site would affect the rural character of the site and is in area of high landscape sensitivity. 2009 SHLAA stated that site not considered to have high scenic quality. The reference to high landscape sensitivity appears to have been derived from a Landscape Sensitivity Study for Hungerford, carried out for the Council by Kirkham Landscape Planning Limited in May 2009. It is not clear why the Council was not able to take account of that report in their first SHLAA 	<p>on the new Local Plan that will supersede the Core Strategy DPD and Housing Site Allocations DPD in 2018.</p> <p>Specific comments on site noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

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	<p>response of April 2009, as the contents of the report would have been available at the time.</p> <ul style="list-style-type: none"> • The Council's comments on representations relating to the 2011 SHLAA commented in respect of HUN002 that "this site was classified as not developable on grounds other than landscape impact and was therefore not included in the Independent Landscape Sensitivity Analysis of the AONB produced during January 2011." This is in contradiction to the 2011 SHLAA which states that the site is not developable because located within a high landscape sensitivity area. • The Council's objections on landscape sensitivity grounds are not justified. As noted in the representations of the owner of the site in February 2011, the effect of the development of this site on the rural character of the area can only be reasonably assessed at the time of the submission of an application. In this connection, attached in Appendix 1 is the layout plan for the 6 houses previously referred to under 04/01429. It is clear that there would be sufficient space available for extensive new landscaping, as part of that development. • The site proposed for development as part of this submission, is perceived to merge with the Town in landscape terms, and as such it is considered to be "clearly distinct" from the more sensitive landscape areas beyond. Additionally with development to the immediate west and east of the site and Marsh Lane clearly separating it from sensitive areas and the site not visible from any point outside of Marsh Lane. Landscapes sensitivity also cannot be an issue for not developing this site. <p>Conclusions:</p> <p>The Council should reassess this site in both terms of its access, which can be adequately provided to the satisfaction of the Council's own Highways Officer, and in terms of the lack of effect on the rural character of the area, having regard to the potential for Sensitivity Report, as set out above. Please note that with regard to access to the site this is now at the eastern side, therefore the 2013 SHLAA comments taken in context with the above make no sense at all. We have shown that access is not an issue and on this basis we request landscape re-assessment</p>	

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Stanford Dingley Parish Council	<p>Potential development:</p> <ul style="list-style-type: none"> • Stanford Dingley has little infrastructure to support development. There is no shop, no school, no community hall and only a weekly bus service which is under threat of withdrawal. Stanford Dingley has a low ranking in the settlement hierarchy [Policy CS11] because of its limited amenities. • The Parish Council considers that Stanford Dingley would not be a suitable location for any housing site allocations. The Parish Design Statement (adopted 2010) supports this at paragraphs 2.3 (site within AONB which is a national designation and has highest level of protection with regard to the conservation of natural beauty), 2.4 (the village has no settlement boundary, is within the AONB and a conservation area covers part of the village), 4.1 (Stanford Dingley and surrounding countryside unique in Pang Valley as built environment relatively untouched by modern development and retains sense of past through historic buildings) and 4.3 (distinctive rural character and open structure of village dependent on views of the surrounding countryside which are obtained through gaps in the development). 	<p>The Housing Site Allocations DPD will allocate the remainder of the 'at least' 10,500 housing figure identified in the Core Strategy in and around the settlements of the district's settlement hierarchy. Stanford Dingley does not fall within the settlement hierarchy and will not, therefore, have any housing allocations. Instead, it is identified in Core Strategy policy ADPP1 as a smaller village with a settlement hierarchy that is suitable only for limited infill development.</p>
	<p>Further comment:</p> <ul style="list-style-type: none"> • The Parish Council welcomes the Policies under the West Berkshire Core Strategy and particularly CS17, 18 and 19. However, we are advocating the retention of other policies identified in Appendix B of Local Development Scheme (dated September 2013) where it states that these are 'To be replaced by West Berkshire Site Allocations and Delivery DPD'. We would be concerned to lose many of the ENV policies which have served well to constrain the overdevelopment of dwellings in the countryside, and have dealt with issues such as the redevelopment of agricultural buildings and extending residential curtilages. We believe it is important to retain a good balance in the size of dwellings in the parish. • The Parish Council would like to see more emphasis placed on Parish/Design Statements in considering all development within the parish. 	<p>The Housing Sites Allocations DPD will include some housing development management policies that will replace several of the saved policies of the West Berkshire Local Plan. These are intended to update the policy matters raised and will be included as part of the preferred options consultation DPD.</p>
Lucy Cliffe for	See attachments for maps of client's apparatus. We would ask that you contact	Comments and plans noted

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and on behalf of Fisher German LLP	us if any works are in the vicinity of the GPSS pipeline or alternatively go to www.linerearchbeforeudig.co.uk .	
Gareth Johns of Environment Agency	<ul style="list-style-type: none"> • We note the Council's proposals for the Housing Site Allocations DPD and have no comments to make. • We are currently reviewing the initial shortlisted sites for housing and would welcome any further opportunities to work with you to ensure that matters within our remit are considered during the plan making process. 	Comments noted.
John Moran of the Health and Safety Executive	<p>Housing Site Allocations DPD:</p> <p>We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, the HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard installations and MAHPs located in the area of your local plan.</p>	The Housing Site Allocations DPD preferred options consultation, due to take place between 25 July and 12 September 2014, will identify preferred sites for allocation. This should enable the HSE to provide advice on compatibility of potential future developments within the consultation zones of major hazard installations. The Housing Site Allocations DPD is being prepared in conformity with the Core Strategy, which has taken into account the consultation zones.
	<p>Further consultation with HSE on Local Plans:</p> <p>The HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process, and we may be able to provide advice on development compatibility as your plan progresses. Therefore, we would like to be consulted further on local plan documents where detailed land allocations and use class proposals are made, e.g. site specific allocations of land in development planning documents. Please send any future request for consultation to:</p> <p>The Administrator – Local Plans Health and Safety Executive</p>	Comments noted. The address included by the HSE is included on our consultation database.

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	<p>HID CEM HD3D Priestly House Priestly Road Basingstoke Hampshire RG24 9NW</p>	
	<p>Note: Incorporating PADHI advice into Local Plans:</p> <p>The HSE recognises that there is a requirement for you to meet the following duties in your plan, and that consultation with the HSE may contribute to achieving compliance:</p> <ol style="list-style-type: none"> 1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents. 2. Regulation 10(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC (Seveso II) 2. Regulation 10(c) (i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas. <p>To assist you in meeting these duties, information on the location and extent of the consultation zones associated with major hazard installations and MAHPs can be found on the HSE extranet system along with advice on HSE's land-use planning policy. Lists of all major hazard installations and MAHPs, consultation zone maps for installations, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access the HSE's <i>Planning Advice for Developments near Hazardous Installations Information Package (PADHI+)</i> on the extranet;</p>	<p>Comments noted.</p> <p>The Core Strategy includes a policy on this issue and defines the zones on the adopted Proposals Map. The Council's Civil Contingencies Manager will be actively engaged in the site selection process.</p>

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	<p>further information is available on the HSE website: http://www.hse.gov.uk/landuseplanning/padhi.htm. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of PADHI+ could assist you in making informed planning decisions about development compatibility. We recommend that for speculative testing of advice that the PADHI+ training database is used. This can be accessed on the land-use planning extranet services screen.</p> <p>PADHI+ cannot be used for developments around nuclear sites, explosives sites or quarries. In these cases you must consult the appropriate HSE directorate for advice. Guidance on consulting the HSE about developments that could encroach on specialised major hazard sites is also available on the website: http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent</p> <p>Identifying Consultation Zones in Local Plans:</p> <p>The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence. Details of pipeline operators and their contact details are also found on the HSE extranet pages.</p> <p>Identifying compatible development in Local Plans:</p> <p>The guidance in <i>PADHI - HSE's Land Use Planning Methodology</i>, available at http://www.hse.gov.uk/landuseplanning/padhi.pdf, will allow you to identify compatible development within any consultation zone in the area of your local</p>	

Respondent	Summary of Representation	Council's response
	<p>plan. The HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on <i>Development Type Tables</i> (pg.9) and the <i>Decision Matrix</i> (pg.17) are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.</p>	
<p>Jane Terry of Bell Cornwell on behalf of JAP ye Ltd and Bovis Homes LTD</p>	<p>Scope of document:</p> <ul style="list-style-type: none"> • The Site Allocations and Delivery DPD should incorporate a review of the settlement hierarchy and boundaries. This should take into account the principles of sustainable development set out in the NPPF as well as those identified within the WBLP which acknowledges the focus of development on the existing settlement pattern. • The WBLP identifies the need for additional growth within the East Kennet Valley and its functional interaction with surrounding centres including Tadley. Consequently the review of the settlement hierarchy should also include Tadley as a sustainable settlement on the edge of the district boundary. 	<p>The Housing Site Allocations DPD will be prepared in accordance with the spatial strategy of the Core Strategy – it is therefore not proposed to review the settlement hierarchy – instead this will be explored through the new Local Plan.</p> <p>A settlement boundary review of the settlements identified within adopted Core Strategy DPD policy ADPP1 (Spatial Strategy) will be carried out for the purposes of the Housing Site Allocations DPD. A review of the remaining settlement boundaries will be completed as part of work on the new Local Plan that will supersede the Core Strategy DPD and Housing Site Allocations DPD in 2018.</p> <p>Any housing allocations within the East Kennet Valley will need to take into consideration Core Strategy policy CS8 (Nuclear Installations – AWE Aldermaston and Burghfield) particularly as the area around Tadley falls within the Inner AWE Aldermaston Consultation Zone.</p>
	<p>Time period:</p>	<p>Since the Housing Site Allocations DPD will be prepared within the framework of the</p>

Respondent	Summary of Representation	Council's response
	<p>Adoption of the Site Allocations DPP is not scheduled until at least December 2015, after the requirement for the SHMA update. This, together with the limited Local Plan period remaining would all point to the need to extend the scope and flexibility of the Site Allocations DPD to ensure sufficient site allocations are made to take into account the SHMA findings of need as well as an adequate five year supply and trajectory.</p>	<p>adopted Core Strategy DPD (and this is a regulatory requirement), the scope of the Housing Site Allocations DPD is more limited in scope and content (the Core Strategy DPD sets out the spatial strategy, policy framework and housing requirement). The process to prepare the DPD is therefore shorter than that of the Core Strategy DPD.</p> <p>By prioritising a Housing Site Allocations DPD at the earliest opportunity, rather than wait for the outcome of the SHMA, West Berkshire Council is pro-actively allocating non-strategic housing sites in accordance with the spatial strategy as set out in the adopted Core Strategy. This is positively planning for the District through the plan-led system as set out in the NPPF and is intended to actively encourage housing delivery.</p> <p>It is proposed to include flexibility within the housing proposals set out within the Housing Site Allocations DPD.</p>
	<p>Housing related development management policies:</p> <p>In preparing the housing related development management policies regard should be made to updating the application of Policy CS8 to reflect changes in the ONR modelling and its' consequential approach to development proposals.</p>	<p>The Health and Safety Executive will be consulted as part of work on the Housing Site Allocations DPD.</p>
<p>Ian Sowerby of Bell Cornwell (attachment)</p>	<ul style="list-style-type: none"> In the context of the Housing Site Allocations DPD scoping consultation, I wish to take the opportunity to confirm that the attached sites remain available for immediate development. 	<p>Comments on the availability of sites THE002 and THE003 noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> • These sites are already included in the 2013 SHLAA as THE002 (Whitehart Meadow, Theale) and THE003 (North Lakeside, Theale). • You will also be aware that the eastern part of site THE003 is the subject of a current planning application for residential development (known as Land at St Ives Close, Theale). 	<p>options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014,</p>
Hungerford Town Council	<ul style="list-style-type: none"> • We are surprised the document, which outlines the overall housing process of preparing a housing site allocations plan, essential to the overall success of the Local Development Framework, should be so brief and lacking in any detail or substance. • The DPD is pivotal in the future allocation of housing in Hungerford and West Berkshire. We would have hoped for more information as to your basis for selection of sites. There seems little information except the timescales that you are working to. • We are also disappointed that the site allocation process has no reference to any local plan documents and more importantly appears to completely disregard the vital local input of town and parish plans. These are the very plans that West Berkshire Council was so keen to promote. • The residents of Hungerford made their views known in the original Hungerford 2010+ Town Plan and then reiterated those views in the updated plan adopted by you last year. We would urge the council to include these important documents as part of their evidence gathering. 	<p>The purpose of the Regulation 18 consultation was to seek representation on what the Housing Site Allocations DPD ought to contain in terms of scope and content. The documentation that was sent out as part of this consultation therefore only provided a brief overview of the proposed timetable and scope.</p> <p>Subject to approval at a meeting of Council on 22 July 2014, the Council will be consulting on the preferred options for the Housing Site Allocations DPD between 25 July and 12 September 2014.</p> <p>The site selection process will take into account discussions that were held with the district's parish and town councils in the early part of 2014.</p>
Mrs. B. Oxenham	<p>I would like to record my objections to including site EUA007, Turnhams Farm, Pincents Lane within the SHLAA and taken forward into the DPD.</p> <p>I have many reasons for my objections and list some below;</p> <ul style="list-style-type: none"> • The site is within open countryside where policies of restraint apply. • It will have a detrimental visual impact on the AONB, as large areas of Turnhams Farm / Pincents Hill are higher than the adjacent AONB. • Landscape and Landmark impact on the areas of Theale, Calcot and 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<p>Tilehurst.</p> <ul style="list-style-type: none"> • Part of the green ridge to Reading. • Biodiversity and Tree Preservation Orders. • It forms a visual buffer between housing in Tilehurst and the industrial/commercial units at the bottom part of the hill. • It will cause Light pollution to the AONB. • There is a lack of local infrastructure, amenities and transport. • There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. • It would restrict the access to the bridleway at the bottom the hill at Nunhide • Loss of amenity for local residents. the area is used regularly for dog walk, cycling, jogging, not to mention the number of horse riders and ramblers who use this area, to allow any housing on this area will lead to accidents • The lane is not suitable for heavy vehicle use as its windy and narrow and steep downwards • Previous scheme have been rejected after costly procedure. • Similar areas within the SHLAA have been identified as “Not currently developable” • IKEA anticipate 1,200,000 car journeys to their store. However, they would not confirm this figure as single or return journeys. It is suggested that a cautious approach be taken to see if the proposed road improvements can cope with the resultant traffic increase. • The inspector at the latest Planning Appeal recommended that Pincent Lane not to be opened up. The assumption was possibly to restrict through traffic to the school areas. Access to the site is severely restricted. <p>I would appreciate my comments being taken into consideration during this consultation period, and should further consultations over policies be required then these objections taken forward to that process.</p>	

Respondent	Summary of Representation	Council's response
<p>Francesca Buck</p>	<ul style="list-style-type: none"> ● I would like to record my objections to including site EUA007, Turnhams Farm, Pincents Lane, being included within the SHLAA and taken forward into the DPD. I have many reasons for my objections and list some below; <ul style="list-style-type: none"> ○ Gap between settlements to prevent the coalescence of built-up area. ○ The site is within open countryside where policies of restraint apply. ○ Detrimental visual impact on the AONB, as large areas of Turnhams Farm / Pincents Hill are higher than the adjacent AONB. ○ Harm to the visual character and open nature of the gap or setting area. ○ Landscape and Landmark impact on the areas of Theale, Calcot and Tilehurst. ○ Part of the green ridge to Reading. ○ Biodiversity and Tree Preservation Orders. ○ It forms a visual buffer between housing in Tilehurst and the industrial/commercial uses to the lower area of the hill. ○ Lack of local infrastructure, amenities and transport. ○ There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. ○ Loss of amenity for local residents. ○ Previous scheme rejected after costly procedure. ○ Similar areas within the SHLAA have been identified as “Not currently developable” ● I also keep my horse down Pincents Lane and should this road be opened not only myself but the neighbouring Stables would have to vacate. As it would not be suitable to keep the horses on what will become a main road. With the sharp corner at the top it's dangerous enough with virtually no traffic. Opening this road mean myself and our neighbours would never be able to leave the yard safely. We look this land due to its quite nature. ● I would appreciate my comments being taken into consideration during this consultation period, and should further consultations over policies be required then these objections taken forward to that process. 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
<p>Anthony Chadley</p>	<ul style="list-style-type: none"> • I would like to record my objections to including site EUA007, Turnhams Farm, Pincents Lane, being included within the SHLAA and taken forward into the DPD. • I am concerned as to the criteria used to identify site EUA007 as “potentially developable” seems flawed. • Of particular relevance are the details used by your inspectors/assessors contained within the “suitability” criteria, as everything seems to point to a grading of “Not currently developable”. • I would respectfully request that the site EUA007 is reclassified according to the criteria established. In addition to this the following areas are of grave importance and need to be taken into consideration; <ul style="list-style-type: none"> ○ Gap between settlements to prevent the coalescence of built-up area. ○ Detrimental visual impact on the AONB, as large areas of Turnhams Farm / Pincents Hill are higher than the adjacent AONB. ○ Harm to the visual character and open nature of the gap or setting area. ○ Landscape and Landmark impact on the areas of Theale, Calcot and Tilehurst. ○ Biodiversity and Tree Preservation Orders cover most of the site ○ It forms a visual buffer between housing in Tilehurst and the industrial/commercial uses to the lower area of the hill. ○ Light pollution to the AONB. ○ Possible sterilisation of mineral deposits ○ Lack of local infrastructure, amenities and transport. ○ There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. ○ Previous scheme rejected after costly procedure. ○ IKEA bringing major traffic disruption to the area, and covers potential entrance to the site. ○ The inspector at the latest Planning Appeal recommended that Pincents Lane not to be opened up. 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> • I would appreciate my comments being taken into consideration during this consultation period, and should further consultations over policies be required then these objections taken forward to that process. 	
Brian Selves	<ul style="list-style-type: none"> • Please accept this email as a record of my objections to including site EUA007, Turnhams Farm, Pincents Lane, being included within the SHLAA and taken forward into the DPD. • I have several reasons for my objections and list them below; <ul style="list-style-type: none"> ○ Gap between settlements to prevent the coalescence of built-up area. ○ The site is within open countryside where policies of restraint apply. ○ Detrimental visual impact on the AONB, as large areas of Turnhams Farm / Pincents Hill are higher than the adjacent AONB. ○ Harm to the visual character and open nature of the gap or setting area. ○ Landscape and Landmark impact on the areas of Theale, Calcot and Tilehurst. ○ Part of the green ridge to Reading. ○ Biodiversity and Tree Preservation Orders. ○ It forms a visual buffer between housing in Tilehurst and the industrial/commercial uses to the lower area of the hill. ○ Light pollution to the AONB. ○ Possible sterilisation of mineral deposits ○ Lack of local infrastructure, amenities and transport. ○ There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. ○ Loss of amenity for local residents. ○ Previous scheme rejected after costly procedure. ○ Similar areas within the SHLAA have been identified as “Not currently developable” ○ IKEA anticipate 1,200,000 car journeys to their store. However, they would not confirm this figure as single or return journeys. It is suggested that a cautious approach be taken to see if the proposed road improvements can cope with the resultant traffic increase. ○ The inspector at the latest Planning Appeal recommended that Pincents Lane not to be opened up. The assumption was possibly to restrict 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<p>through traffic to the school areas. Access to the site is severely restricted.</p> <ul style="list-style-type: none"> • I would appreciate my comments being taken into consideration during this consultation period, and should further consultations over policies be required then these objections taken forward to that process. 	
Steven and Margaret Fenner	<ul style="list-style-type: none"> • We are writing to you to object to any proposal to include Pincents Hill and the surrounding land in the Strategic Housing Land Availability Assessment (SHLAA). • We would like to renew our objections to any proposed development in this Area of Outstanding Natural Beauty (AONB). We consider that the comprehensive list of objections raised by the campaign group in 2010 and fully endorsed by ourselves do still apply. • In particular, we are concerned by the irreparable damage that would be caused by any development to this AONB and also by the loss of the settlement gap between Calcot and Tilehurst. In addition, the surrounding roads simply cannot cope with the increased traffic that would obviously be generated by any development. • This matter is of great importance to us and we would appreciate our concerns being included when this matter is under consideration 	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.
David and Ann Osbourne	<ul style="list-style-type: none"> • We are writing to very strongly object to the DPD. The site is a unique Greenfield site which needs to be protected for its own sake and it is not included in the Local Development Plan. It is currently used as an amenity countryside area with many species of wildlife; it forms part of a wildlife corridor and a strategic gap between the areas of Tilehurst, Calcot and Theale thereby preserving the identity and character of these areas. The concerns we have are listed below: <ul style="list-style-type: none"> ○ Gap between settlements to prevent the coalescence of built-up area. ○ The site is within open countryside where policies of restraint apply. ○ Detrimental visual impact on the AONB, as large areas of Turnhams Farm/Pincents Hill are higher than the adjacent AONB. ○ Harm to the visual character and open nature of the gap or setting area. ○ Landscape and Landmark impact on the areas of Theale, Calcot and Tilehurst. 	Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> ○ Part of the green ridge to Reading. ○ Biodiversity and Tree Preservation Orders. ○ It forms a visual buffer between housing in Tilehurst and the industrial/commercial uses to the lower area of the hill. ○ Light pollution to the AONB. ○ Possible sterilisation of mineral deposits ○ Lack of local infrastructure, amenities and transport. ○ There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. ○ IKEA anticipate 1,200,000 car journeys to their store. However, they would not confirm this figure as single or return journeys (2 million a year?). It is suggested that a cautious approach be taken to see if the proposed road improvements can cope with the resultant traffic increase. ○ The inspector at the latest Planning Appeal recommended that Pincent's Lane not to be opened up. The assumption was possibly to restrict through traffic to the school areas. Access to the site is severely restricted. 	
<p>Joan Lawrie on behalf of the combined SaveCalcot and SavePincent's Hill groups</p>	<ul style="list-style-type: none"> ● The combined SaveCalcot and SavePincent's Hill Groups would like to comment as follows on the draft proposals for the SHLAA and for the reasons stated below ask for this site to be removed. We feel we can do no better than to reiterate the points we raised against the inclusion of Pincent's Hill in the last SHLAA. <ul style="list-style-type: none"> ○ This is a strategic gap between settlements to prevent the coalescence of a built-up area which West Berkshire District Council has said it will honour this commitment until 2016. ○ The site is within open countryside where policies of restraint apply. This site is unique. It has 4 public footpaths (13, 14, 15 and 20). It has a softening approach to the AONB. It is a haven for wildlife; a countryside greenfield area which is enjoyed as a recreational area for dog walking, exercise, nature study by schools; also it is a recognized significant landmark. ○ It would cause a detrimental visual impact on the AONB, as large areas 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<p>of Turnhams Farm/Pincents Hill are higher than the adjacent AONB.</p> <ul style="list-style-type: none"> ○ Harm to the visual character and open nature of the gap or setting area. ○ There is a significant amount of wildlife including a considerable number of badger sets, slow worms, bats, etc. ○ Landscape and Landmark impact on the areas of Theale, Calcot and Tilehurst and beyond. Pincents Lane itself probably dates back to Saxon times, and is the last remaining sunken lane in Tilehurst. It acts as a bridleway and again, there are no longer any remaining bridleways still existing in the area that we are aware of. ○ It is part of the continuous green ridge to Reading. ○ Biodiversity and numerous Tree Preservation Orders exist. ○ It forms a visual buffer between housing in Tilehurst and the industrial/commercial uses to the lower area of the hill. ○ Light pollution to the AONB. ○ The site is Grade 2 agricultural land and contains mineral deposits which could be sterilised if developed. ○ The area suffers from lack of local infrastructure, amenities and transport with some of the bus services being axed. ○ There are four official footpaths across this site, Footpaths 13, 14, 15 and 20. ○ IKEA anticipate 1,200,000 car journeys to their store. However, they would not confirm this figure as single or return journeys (over 2 million a year which averages at 6,500 per day?). It is respectfully suggested that a cautious approach be taken to see if the proposed road improvements can cope with the resultant traffic increase. We are not convinced that the road improvements to accommodate the extra increased local traffic and IKEA will improve the situation. ○ The Inspector at the latest Planning Appeal recommended that Pincents Lane not to be opened up. The assumption was possibly to restrict through traffic to the school areas. Access to the site is severely restricted. ○ It was also noted by the Inspector that the gradient of the hill would render the use of prams and wheelchairs extremely difficult. ○ Thames Water has stated that Grampian pumps would be needed to 	

Respondent	Summary of Representation	Council's response
	<p>provide water to a development on the hill.</p> <ul style="list-style-type: none"> ○ We understand that both Policy C2 of the BSP and Policy ENV.18 of the WBDLP only permit development in the countryside in exceptional circumstances, “where such a location is essential and where the reuse, adaptation or redevelopment of existing buildings would assist the diversification of the rural economy and maintain or enhance the rural environment. Further, that such development must be appropriate in scale, form, impact, character and siting to its countryside location and be acceptable in terms of other relevant Development Plan policies”. ○ The area has a history of sink holes suddenly appearing and suffers from many boggy areas. The adjoining area at the top of the Recreation Grounds is frequently water logged from the run off. <ul style="list-style-type: none"> ● Lack of local infrastructure and amenities make this site unsustainable even allowing for the extension of education facilities in Theale. The Inspector referred to the pedestrian journeys to reach the stations at Theale and Tilehurst. With regard to Theale he said it would be difficult for older people, mothers with children and prams and people with shopping to actually walk up the hill from the station as it could be both a long and steep climb. Tilehurst station is a good 40 minute walk from City Road. ● Pincents Lane is very narrow 8ft wide in many places, with road slippage and if opened would become a rat run from the A4 causing added danger to the children that attend the four schools in the immediate area, especially with the extra traffic envisaged from IKEA. NB Little Heath Schools playing fields are on the opposite site of the road to the school. 	
	<p>Site Ref: EUA004 Land at Pincents Lane, Calcot Reading</p> <p>Although we note that this land is “Not currently available” we would like to make the following observation that this land is also subject to sink holes. Some years back a horse was swallowed by one and it took the Fire Brigade approx 5 hours to rescue the horse with inflatable bags to raise it out of the hole.</p>	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>
	<p>Site Ref: EUA027: Land north of Pincents Lane, Calcot</p>	<p>Comments noted. Comments in relation to</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> • We would respectfully point out that the reference in this document to the Calcot Hotel is mistaken, it is the Pincents Hotel and regardless of Government policy we think that any erosion of the AONB is inappropriate. Under Section 85 of the Countryside and Rights of Way Act 2000 it is a legal duty for all relevant authorities to have regard to the primary purpose of AONBs to conserve and enhance the natural beauty of the area. • We agree with the North Wessex Downs Report that “With the revocation of the RSS there is no longer a requirement to locate the 1000 houses within part of the AONB as originally proposed in the selection process of the correct approach to adopt in the North Wessex Downs AONB, which is that house building there should only address local needs.” This is a national policy (PPS7 paragraph 21) which should frame the options within which choice can be exercised in West Berkshire but appears to have been overlooked. If this is the case, we consider the proposed Core Strategy would therefore be unsound. The growth of Pangbourne and the westward expansion of Tilehurst into the AONB, breaches a boundary which in effect has been fixed for decades. This is contrary to national AONB policy. • We note that part of WBC's reason for accommodating 1,500 dwellings in the Eastern Area, partly in the AONB all along the edge of Tilehurst, is “to support the growth of the Reading area”. That is not the purpose of the AONB. We would suggest that there is no other AONB in the South East that is to be affected to this extent. 	<p>specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>
<p>Mrs. P. F. Roffe</p>	<p>I wish to register my opposition to Site Ref: EVA007 Pincents Hill - Turnhams Farm, Pincents Lane, Tilehurst being included in the Draft SHLAA for the following reasons:</p> <ul style="list-style-type: none"> • Once built, IKEA will attract many thousand of car journeys each month to their store in Calcot. • The site is within open countryside where policies of restraint are in place. • It is vitally important to retain the natural gap between settlements. • Footpaths 13, 14, 15 and 20 are official footpaths across this site. These footpaths are used daily by members of the public. 	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<ul style="list-style-type: none"> The Inspector at the latest Planning Appeal recommended that Pincents Lane ought not to be opened up. 	
Barbara Moir	<p>I write to express concern over the inclusion of this area as potentially developable as I feel development will have a significantly detrimental impact on the quality of life locally. My concerns relate to four main areas:</p> <ol style="list-style-type: none"> Loss of local amenity <p>The replacement of many acres of green fields by more housing or commercial buildings will greatly detract from the green amenity of the area. Pincents Hill is one of the few remaining open spaces left in Tilehurst and it would be a travesty to lose it. The site is within open countryside where policies of restraint apply. Development will have a detrimental visual impact on the AONB, as large areas of Turnhams Farm/Pincents Hill are higher than the adjacent AONB.</p> <ol style="list-style-type: none"> Access from Tilehurst to Theale by cycle and foot <p>There are four official footpaths across this site; Footpaths 13, 14, 15 and 20. Like many local residents, we routinely walk in the area and use Pincents Lane as a means of walking to the commercial units near the motorway and for cycling to Theale and beyond. Pincents Lane is the only quiet and safe route left between our home to the area to the south. The arrival of IKEA will have enough of an adverse effect, so it would be a double loss to replace this rural lane with yet more buildings and the inevitable traffic that would be associated with them.</p> <ol style="list-style-type: none"> Traffic levels <p>The traffic levels along the Bath Road and around Junction 12 are far from low. The traffic in the area frequently moves at a snail's pace, especially during school and rush hours. While I applaud the decision to make improvements to the Bath Road between Langley Hill and Savacentre, the opening of IKEA will add to the existing traffic levels in the area. IKEA anticipate 1,200,000 car</p>	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<p>journeys to their store. Surely a cautious approach to further development should be taken to see if the road improvements can cope with the projected traffic increases.</p> <p>4. Local planning policy</p> <p>The inspector at the last Planning Appeal for this plot of land recommended that Pincents Lane not be opened up. The assumption was possibly to restrict through traffic to the school areas. Access to the site is severely restricted. For many years it has been Council policy to protect the green gap between Tilehurst and Theale. We wholeheartedly support this policy. I feel the protection of the remaining pieces of Tilehurst's undeveloped land is important for the reasons given above and I trust that the Council and its officers will robustly defend the area as you have done in the past.</p>	
Paul Moir	<p>I write to express concern over the inclusion of this area as potentially developable as I feel development will have a significantly detrimental impact on the quality of life locally. My concerns relate to four main areas:</p> <p>1. Loss of local amenity</p> <p>The replacement of many acres of green fields by more housing or commercial buildings will greatly detract from the green amenity of the area. Pincents Hill is one of the few remaining open spaces left in Tilehurst and it would be a travesty to lose it. The site is within open countryside where policies of restraint apply. Development will have a detrimental visual impact on the AONB, as large areas of Turnhams Farm/Pincents Hill are higher than the adjacent AONB.</p> <p>2. Access from Tilehurst to Theale by cycle and foot</p> <p>There are four official footpaths across this site; Footpaths 13, 14, 15 and 20. Like many local residents, we routinely walk in the area and use Pincents Lane as a means of walking to the commercial units near the motorway and for cycling to Theale and beyond. Pincents Lane is the only quiet and safe route</p>	<p>Comments noted. Comments in relation to specific sites will be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p>

Respondent	Summary of Representation	Council's response
	<p>left between our home to the area to the south. The arrival of IKEA will have enough of an adverse effect, so it would be a double loss to replace this rural lane with yet more buildings and the inevitable traffic that would be associated with them.</p> <p>3. Traffic levels</p> <p>The traffic levels along the Bath Road and around Junction 12 are far from low. The traffic in the area frequently moves at a snail's pace, especially during school and rush hours. While I applaud the decision to make improvements to the Bath Road between Langley Hill and Savacentre, the opening of IKEA will add to the existing traffic levels in the area. IKEA anticipate 1,200,000 car journeys to their store. Surely a cautious approach to further development should be taken to see if the road improvements can cope with the projected traffic increases.</p> <p>4. Local planning policy</p> <p>The inspector at the last Planning Appeal for this plot of land recommended that Pincents Lane not be opened up. The assumption was possibly to restrict through traffic to the school areas. Access to the site is severely restricted. For many years it has been Council policy to protect the green gap between Tilehurst and Theale. We wholeheartedly support this policy. I feel the protection of the remaining pieces of Tilehurst's undeveloped land is important for the reasons given above and I trust that the Council and its officers will robustly defend the area as you have done in the past.</p>	
<p>Martin Small of English Heritage</p>	<p>English Heritage will expect the selection of sites to be allocated for housing (or any development) to be based on, inter alia, full and proper consideration of the potential impacts of development on the historic environment; in particular on heritage assets and their setting, and the need to conserve and enhance those assets.</p> <p>Of particular concern to English Heritage is the Registered Battlefield of the First Battle of Newbury, which is on the current Heritage at Risk Register as we</p>	<p>Comments noted. An informal approach will be made to English Heritage to provide comments on potential housing sites in advance of any formal public consultation. Comments in relation to specific sites will also be invited and taken into account as part of our preferred options consultation on the Housing Site Allocations DPD. Subject</p>

Respondent	Summary of Representation	Council's response
	<p>consider it to be at risk from housing development around its fringes – already some of the south-eastern periphery of the Battlefield has been built upon.</p> <p>We note the Council's intention to eventually replace the adopted Core Strategy and the proposed Housing Sites Allocations DPD with a new Local Plan, but the Council should give consideration to the inclusion of a historic environment development management policy in the Housing Site Allocations DPD.</p>	<p>to Council approval on 22 July 2014, this will run between 25 July and 12 September 2014.</p> <p>A Local Plan will be prepared, to look longer term, to allocate the rest of the housing requirement based on the objectively assessed housing need and to include all of the detailed development management policies which are needed to determine planning applications in the District.</p>
<p>Graham Ritchie of Wokingham Borough Council</p>	<p>Wokingham Borough Council would wish to discuss the following issues with yourselves as part of the production of the your DPD where they relate to housing sites within the Kennet Valley school place planning, transport and flood. Furthermore, having regard to the collaborative work of the local authorities with the Office for Nuclear Regulation around the AWE sites in assessing potential issues of population growth and the effective operation of the emergency plan for the sites, the Council would wish to be involved in continuing this work and how implementation of your DPD will not affect delivery of agreed development plans.</p> <p>In the event that the subject matter of the DPD changes, the Council would wish to re-consider what topics would be relevant for duty to co-operate discussions.</p>	<p>Comments Noted.</p> <p>Work has commenced on a Strategic Housing Market Assessment (SHMA) in conjunction with Wokingham Borough Council and other Berkshire authorities. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will also be involved. The work is scheduled to conclude towards the end of the year (2014). The SHMA will help to identify the Council's 'objectively assessed' housing need as set out in the NPPF.</p> <p>Once the housing allocations have been confirmed, the Infrastructure Delivery Plan will be updated in partnership with service providers. This work will include neighbouring authorities where there are cross-boundary infrastructure implications. Any housing allocations within the East Kennet Valley will need to take into consideration Core Strategy policy CS8 (Nuclear Installations – AWE Aldermaston and Burghfield) particularly as the area</p>

Respondent	Summary of Representation	Council's response
		around Tadley falls within the Inner AWE Aldermaston Consultation Zone.

From: [PlanningPolicy](#)
To: [All Members](#)
Subject: Housing Site Allocations DPD Preferred Options
Date: 25 July 2014 13:09:00
Attachments: [image001.jpg](#)

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the following two documents:

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for gypsies, travellers and travelling showpeople will also be allocated in the DPD, and a revised policy for Sandford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting you for your views on our Housing Site Allocations DPD Preferred Options. This has been produced taking into account national and local policy, as well as evidence gathering and discussions held with the Parish/Town Councils.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a seven week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferredoptions. As the proposals involve preferred site allocations, we have informed neighbouring households (within 100 metres of the boundaries of the preferred sites) of the consultation by letter.

Draft Planning Obligations SPD:

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' Supplementary Planning Document (SPD). The SPD provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to download on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on

the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection at all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD online at <http://consult.westberks.gov.uk/portal>. Alternatively, a comment form is available on our webpage which should be returned via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Should you have any queries on either the Housing Site Allocations DPD Preferred Options or the Draft Planning Obligations SPD, please contact the Planning Policy Team on 01635 519 111 or email planningpolicy@westberks.gov.uk.

Yours faithfully,

Gary Lugg
Head of Planning and Countryside

Housing Site Allocations Development Plan Document (DPD) Preferred Options

Ref: (For official use only)

Comments should be returned by Friday 12th September 2014:

Via our consultation portal at the Council's website: <http://consult.westberks.gov.uk/portal>

By post to: Planning Policy, Planning and Countryside, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD

By e-mail to: planningpolicy@westberks.gov.uk

By fax to: 01635 519408

This form has two parts –
Part A – Personal details
Part B – Comments on the Preferred Options of the Housing Site Allocations DPD

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text"/>
Telephone Number	<input type="text"/>
E-mail Address	<input type="text"/>

2. Agent's Details (if applicable)

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

Do you want to be kept informed on the progress of this DPD?
If so please make sure you provide an e-mail address above

Yes/ No

Part B - Please use a separate response sheet for each comment

The DPD will be examined by an independent inspector whose role includes assessing whether the plan is sound. For the Housing Site Allocations DPD to be sound it should be:-

- **Positively prepared** – the plan should seek to meet the housing requirement for the District based on the policies set out in the adopted Core Strategy;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective working on cross-boundary strategic priorities;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

We are therefore seeking your views on the soundness of the DPD Preferred Options. Your comments will be published on our Local Plan Consultation Portal and should be planning related. The Council has a duty not to accept comments of a discriminatory nature.

<p>To which part of the document does this comment relate? Please specify the section, site or policy on which you are commenting.</p>	<p>Section.....</p> <p>Site.....</p> <p>Policy.....</p>
<p>Do you consider the preferred approach/option to be sound</p>	<p>Yes/ No</p>

Please give your reasons and, if objecting, please indicate what changes you are seeking or what would be your preferred alternative approach or option for allocation.

Please continue on separate sheet

25 July 2014

Planning and Countryside

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: DPD9 (Housing Site Allocations) and SPD 2 (Developer Contributions)

Please ask for: Planning Policy Team

Direct Line: 01635 519 111

e-mail:

planningpolicy@westberks.gov.uk

Dear Sir / Madam,

Housing Site Allocations Development Plan Document Preferred Options Consultation and Draft Planning Obligations Supplementary Planning Document Consultation

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the following two documents:

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for Gypsies and Travellers and Travelling Showpeople will also be allocated in the DPD, and a revised policy for Sandleford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting you for your views on our Housing Site Allocations DPD Preferred Options. This has been produced taking into account national and local policy, as well as evidence gathering and discussions held with the Parish/Town Councils.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a seven week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

Draft Planning Obligations SPD:

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' Supplementary Planning Document (SPD). The SPD

provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to view on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection at all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD online at <http://consult.westberks.gov.uk/portal>. Alternatively, you can submit comments via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Should you have any queries on either the Housing Site Allocations DPD Preferred Options or the Draft Planning Obligations SPD, please contact the Planning Policy Team using the contact details above.

Yours faithfully,



Gary Lugg
Head of Planning and Countryside

From: [PlanningPolicy](#)
To: [PlanningPolicy](#)
Subject: West Berkshire Housing Site Allocations Development Plan Document (DPD) Preferred Options
Date: 25 July 2014 12:18:55
Attachments: [image001.jpg](#)

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the following two documents:

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for gypsies, travellers and travelling showpeople will also be allocated in the DPD, and a revised policy for Sandford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting you for your views on our Housing Site Allocations DPD Preferred Options. This has been produced taking into account national and local policy, as well as evidence gathering and discussions held with the Parish/Town Councils.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a seven week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

Draft Planning Obligations SPD:

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' Supplementary Planning Document (SPD). The SPD provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to download on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection at all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD online at <http://consult.westberks.gov.uk/portal>. Alternatively, a comment form is available on our webpage which should be returned via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Should you have any queries on either the Housing Site Allocations DPD Preferred Options or the Draft Planning Obligations SPD, please contact the Planning Policy Team on 01635 519 111 or email planningpolicy@westberks.gov.uk.

Yours faithfully,



Gary Lugg
Head of Planning and Countryside

From: [PlanningPolicy](#)
To: [PlanningPolicy](#)
Subject: West Berkshire Housing Site Allocations DPD Preferred Options
Date: 25 July 2014 13:02:27
Attachments: [Preferred options poster.pdf](#)
[image001.jpg](#)

Dear Parish Clerk / Chairman

The consultation on the Housing Site Allocations DPD Preferred Options commences today and runs for a period of 7 weeks until Friday 12 September.

We have already sent letters to Parish Clerks regarding the consultation, enclosing a poster for display. Please let us know if you are able to display more and would like additional copies. Alternatively we attach an electronic copy which could be printed.

As the proposals involve preferred site allocations we have informed neighbouring households (within 100 metres of the boundaries of the preferred sites) of the consultation by letter.

The e-mail which was sent out to those on our database is set out below, for your information. Please contact the Planning Policy team if you have any questions.

Dear Sir / Madam,

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the following two documents:

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for gypsies, travellers and travelling showpeople will also be allocated in the DPD, and a revised policy for Sandford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting you for your views on our Housing Site Allocations DPD Preferred Options. This has been produced taking into account national and local policy, as well as evidence gathering and discussions held with the Parish/Town Councils.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a seven week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

Draft Planning Obligations SPD:

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' Supplementary Planning Document (SPD). The SPD provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to download on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection at all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD online at <http://consult.westberks.gov.uk/portal>. Alternatively, you can submit comments using the attached comments forms via email using the attached comments forms to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Should you have any queries on either the Housing Site Allocations DPD Preferred Options or the Draft Planning Obligations SPD, please contact the Planning Policy Team on 01635 519 111 or email planningpolicy@westberks.gov.uk.

Yours faithfully,



Gary Lugg
Head of Planning and Countryside

25th July 2014

The Occupier

Planning and Countryside

West Berkshire Council
Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref:DPD9 (Housing Site Allocation)

Please ask for: Planning Policy Team

Direct Line: 01635 519111

e-mail: planningpolicy@westberks.gov.uk

Dear Sir/Madam,

Housing Site Allocations Development Plan Document (DPD) Preferred Options Consultation

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for Gypsies and Travellers and Travelling Showpeople will also be allocated in the DPD, and a revised policy for Sandleford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting you for your views on our Housing Site Allocations DPD Preferred Options because you live within 100 metres of the boundary of one of the preferred option housing sites.

The DPD has been produced taking into account national and local policy, as well as evidence gathering and discussions held with the Parish/Town Councils. It is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options DPD for consultation.

We are holding a seven week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreddoptions.

Hard copies of the consultation material are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection at all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have online at <http://consult.westberks.gov.uk/portal>. Alternatively, you can submit comments using the attached comments forms via email to planningpolicy@westberks.gov.uk, by fax 01635 519408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Should you have any queries, please contact the Planning Policy Team using the contact details above.

Yours faithfully



Gary Lugg
Head of Planning and Countryside

Introduction – Housing Site Allocations DPD

Following the adoption of the West Berkshire Core Strategy in July 2012, we have prepared a preferred options Housing Site Allocations Development Plan Document (DPD).

The DPD includes the following:

- The allocation of non-strategic housing sites across the District in accordance with the spatial strategy of the Core Strategy which divides the District into 4 spatial areas.
- The sites have all been assessed in a consistent manner using technical evidence to shortlist the potentially developable sites from the Strategic Housing Land Availability Assessment (SHLAA). The shortlisted sites are set out in the DPD. In some cases these are set out as options where choices will need to be made through the consultation process.
- The allocation of sites for 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. We have initial need figures and have allocated sites as preferred options to meet the need.
- Some policies are also being updated as part of the DPD. The policy on Sandford Park has been updated to reflect revised technical evidence on highways and education so that it will set out an up to date framework to guide any planning applications on the site.
- Revised residential parking standards are also included in the DPD.
- Policies on development in the countryside are also being updated and will be presented to full Council in September with consultation to follow.

The DPD is being presented to full Council on 22 July 2014 for approval for consultation. Following the consultation, officers will prepare a publication version of the plan for Council in December 2014, which takes account of the comments received.

The consultation period will run from 25 July to 12 September 2014. Copies of the documents will be available at all libraries in the District and at the Council Offices. All information will be available on our website at www.westberks.gov.uk/housingsiteallocations

MEMORANDUM

To: Planning Reception **Our Refs:** DPD9 (Housing Site Allocations) and SPD 2 (Developer Contributions)

From: Planning Policy **Your Ref:**

Extn: 2111 **Date:** 25 July 2014

Re: Housing Site Allocations Development Plan Document Preferred Options Consultation and Draft Planning Obligations Supplementary Planning Document Consultation

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the Housing Site Allocations Development Plan Document (DPD) Preferred Options and the draft Planning Obligations Supplementary Planning Document (SPD).

Could you please display the enclosed Housing Site Allocations DPD Preferred Options, Approach to the Housing Site Allocations DPD Background Paper, Draft Planning Obligations SPD, response forms and this covering memo in the planning reception until Friday 12 September 2014.

Further details on both consultations and how comments can be made are provided below; however any queries should be directed to the Planning Policy Team using the contact details above.

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for Gypsies and Travellers and Travelling Showpeople will also be allocated in the DPD, and a revised policy for Sandford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting on our preferred options document which has been produced taking into account national and local policy, as well as discussions with the Parish/Town Councils and evidence gathering.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

Planning Obligations Supplementary Planning Document (SPD):

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' SPD. The SPD provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to view on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays and at all public libraries in the District during their normal opening hours.

We encourage comments on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD to be submitted online at <http://consult.westberks.gov.uk/portal>. Alternatively, comments can be submitted via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Planning Policy Team

MEMORANDUM

To: Customer Services Office,
Sainsbury's Calcot

Our Refs: DPD9 (Housing Site
Allocations)

From: Planning Policy

Your Ref:

Extn: 2111

Date: 25 July 2014

Re: Housing Site Allocations Development Plan Document Preferred Options Consultation

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the Housing Site Allocations Development Plan Document (DPD).

Could you please display the enclosed Housing Site Allocations DPD Preferred Options, Approach to the Housing Site Allocations DPD Background Paper, response forms and this covering memo in your office until Friday 12 September 2014.

Further details on both consultations and how comments can be made are provided below; however any queries should be directed to the Planning Policy Team using the contact details above.

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for Gypsies and Travellers and Travelling Showpeople will also be allocated in the DPD, and a revised policy for Sandleford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting on our preferred options document which has been produced taking into account national and local policy, as well as discussions with the Parish/Town Councils and evidence gathering.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic

Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays and at all public libraries in the District during their normal opening hours.

We encourage comments on the Housing Site Allocations DPD Preferred Options to be submitted online at <http://consult.westberks.gov.uk/portal>. Alternatively, comments can be submitted via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Planning Policy Team

MEMORANDUM

To: All West Berkshire Libraries **Our Refs:** DPD9 (Housing Site Allocations) and SPD 2 (Developer Contributions)

From: Planning Policy **Your Ref:**

Extn: 2111 **Date:** 25 July 2014

Re: Housing Site Allocations Development Plan Document Preferred Options Consultation and Draft Planning Obligations Supplementary Planning Document Consultation

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the Housing Site Allocations Development Plan Document (DPD) Preferred Options and the draft Planning Obligations Supplementary Planning Document (SPD).

Could you please display the enclosed Housing Site Allocations DPD Preferred Options, Approach to the Housing Site Allocations DPD Background Paper, Draft Planning Obligations SPD, response forms and this covering memo in your library until Friday 12 September 2014.

Further details on both consultations and how comments can be made are provided below; however any queries should be directed to the Planning Policy Team using the contact details above.

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

Sites for Gypsies and Travellers and Travelling Showpeople will also be allocated in the DPD, and a revised policy for Sandford Park strategic site allocation and residential parking policy for new development will also be included. The criteria which we intend to use to revise settlement boundaries is also being published for consultation. Policies to guide development in the countryside will be subject to consultation in the autumn.

We are now consulting on our preferred options document which has been produced taking into account national and local policy, as well as discussions with the Parish/Town Councils and evidence gathering.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

Planning Obligations Supplementary Planning Document (SPD):

The Council currently seeks developer contributions in accordance with our 'Delivering Investment from Sustainable Development' SPD. The SPD provides guidance to those wishing to develop in West Berkshire about the level and scope of developer contributions likely to be required from development of 1 new dwelling or more, or commercial development accommodating 10 or more employees.

The SPD has recently been updated to provide guidance for the development industry about the much reduced use of developer contributions after the Council's implementation of the Community Infrastructure Levy on 1 April 2015. Comments are now sought on the draft SPD between **Friday 25 July and Friday 12 September 2014**. The Draft SPD and supporting documents are available to view on the Council's website at www.westberks.gov.uk/contributionsspd. Further information on the new Community Infrastructure Levy is available at www.westberks.gov.uk/cil.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays and at all public libraries in the District during their normal opening hours.

We encourage comments on the Housing Site Allocations DPD Preferred Options and/or Planning Obligations SPD to be submitted online at <http://consult.westberks.gov.uk/portal>. Alternatively, comments can be submitted via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Planning Policy Team

25 July 2014

Planning and Countryside

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: DPD9 (Housing Site Allocations) and SPD 2 (Developer Contributions)

Please ask for: Planning Policy Team

Direct Line: 01635 519 111

e-mail:

planningpolicy@westberks.gov.uk

Dear Sir / Madam,

Housing Site Allocations Development Plan Document Preferred Options Consultation

Between Friday 25 July and Friday 12 September 2014, West Berkshire Council will be consulting on the Housing Site Allocations Development Plan Document (DPD) Preferred Options.

Could you please display the enclosed Housing Site Allocations DPD Preferred Options and Approach to the Housing Site Allocations DPD Background Paper, response forms and this covering letter in your library until Friday 12 September 2014.

Further details on the consultation and how to comment are provided below; however any queries should be directed to the Planning Policy Team using the contact details above.

Housing Site Allocations Development Plan Document (DPD) Preferred Options:

The Council is currently preparing its Housing Site Allocations DPD which will allocate specific smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. These sites will be in those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages.

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We are now consulting on our preferred options document which has been produced taking into account national and local policy, as well as discussions with the Parish/Town Councils and evidence gathering.

The Housing Site Allocations DPD is subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

Copy of letter sent to Southcote Library and Tilehurst Library

We are holding a six week informal consultation period between **Friday 25 July and Friday 12 September 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapreferreoptions.

How to comment on the consultations:

All documents are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD free of charge between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays and at all public libraries in the District during their normal opening hours.

We encourage comments on the Housing Site Allocations DPD Preferred Options to be submitted online at <http://consult.westberks.gov.uk/portal>. Alternatively, comments can be submitted via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Yours faithfully

Planning Policy Team

3 July 2014

Planning Policy Team

Planning Policy
West Berkshire Council
Council Offices
Market Street Newbury
Berkshire RG14 5LD

Direct Line: 01635 519111

e-mail: PlanningPolicy@westberks.gov.uk

Dear Parish Clerk

Housing Site Allocations Development Plan Document – Consultation on Preferred Options

I am writing to give you prior notification that the Preferred Options Draft of the Housing Site Allocations Development Plan Document (DPD) will be reported to a special meeting of full Council on 22 July 2014. Papers will be in the public domain approximately 7 days before the meeting.

If full Council approves the draft DPD, it will then be published for a 7 week period of consultation from 25 July 2014 to 12 September 2014.

The DPD will contain the following information:

- Preferred housing site allocations for those areas defined by the adopted Core Strategy's settlement hierarchy as urban areas, rural service centres or service villages. For some settlements these will be presented as options from which choices will then need to be made. The preferred housing sites have been selected from the Strategic Housing Land Availability Assessment (SHLAA) which was published in December 2013 and discussed with Parish and Town Councils during February and March 2014.
- Preferred allocations for the provision of pitches for Gypsies, Travellers and Travelling Showpeople across the District, based on identified need.
- An updated policy to guide the development of Sandleford Park.
- Revised residential parking standards.

The criteria which we intend to use to revise settlement boundaries is also being published for consultation.

Additionally there will be background papers available which will explain our overall approach to the DPD and the process we went through in selecting the preferred housing sites as well as other technical reports.

An additional consultation on policies to guide development in the countryside will be published in the autumn.

I enclose a brief article which may be of use for your circulation lists, websites and parish newsletters. Additionally, if you know of any community newsletters covering your area, it would be very useful if you could forward contact details to me.

We will be sending consultation information to you after the full Council meeting. This will include posters which, if possible, it would be helpful if you could display on your noticeboards.

I hope that this information is useful. Please do not hesitate to contact one of the Planning Policy team if you have any queries at 01635 519111 or by email at planningpolicy@westberks.gov.uk.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gary Lugg', written in a cursive style.

Gary Lugg
Head of Planning and Countryside

Housing Site Allocations Development Plan Document (DPD)

The Preferred Options Draft of the Housing Site Allocations Development Plan Document (DPD) will be reported to a special meeting of full Council on 22 July 2014. If full Council approves the draft DPD, it will then be published for a 7 week period of informal consultation from 25 July 2014 to 12 September 2014.

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- Preferred allocations for the provision of pitches for Gypsies, Travellers and Travelling Showpeople across the District, based on identified need.
- An updated policy to guide the development of Sandleford Park.
- Revised residential parking standards.

Additionally there will be background explanatory papers available.

An additional consultation on policies to guide development in the countryside will be published in the autumn.

We would like your comments on the proposals within the draft Plan during the consultation period. Copies of the consultation documents will be made available at the libraries in the District and at the Council offices. You can comment via our consultation portal at <http://consult.westberks.gov.uk/portal> and register using the login/register section. Alternatively please fill in the on-line consultation form which is available at www.westberks.gov.uk/housingsiteallocations and return it to us by email at planningpolicy@westberks.gov.uk. Hard copies of the consultation form can also be made available.

Housing site allocations

...Have your say



Preferred options consultation

**Friday 25 July
to Friday 12 September 2014.**

Visit www.westberks.gov.uk/hsapreferreduptions

Contact the Planning Policy Team planningpolicy@westberks.gov.uk or **01635 519111**, or visit your local Library for more information or to comment on the Preferred Options DPD.



From: [PlanningPolicy](#)
To:
Cc: [PlanningPolicy](#)
Subject: West Berkshire Local Plan : Consultation on Policies for Housing in the Countryside
Date: 19 September 2014 15:11:08
Attachments: [image003.jpg](#)

Dear Member

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD)

Part 1 – Site Allocations

The Council is currently preparing its Housing Site Allocations DPD and has recently consulted on the first part of the Preferred Options, which set out smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. The Preferred Options also allocated sites for Gypsies, Travellers and Travelling Showpeople and set out revised policies for the Sandford Park strategic site allocation and residential parking policy for new development. The consultation has now closed and the comments are currently being analysed.

Part 2 - Housing in the Countryside Policies: Preferred Options Consultation

We are now consulting you for your views on the second part of the Housing Site Allocations DPD which is our Housing in the Countryside Policies (Preferred Options). These policies will manage housing development in the countryside of West Berkshire and all relate to housing and the potential to convert or redevelop existing buildings to housing. They have been produced taking into account national and local policy and evidence gathering. The policies, when adopted, will replace a number of the policies from the West Berkshire District Local Plan 1991-2006 which are currently 'saved'.

The Housing in the Countryside Policies are subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period on our Housing in the Countryside policies between **Friday 19 September and Friday 31 October 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapolicies.

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How to comment on the consultation:

The Housing in the Countryside policies are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection through all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing in the Countryside Policies online at <http://consult.westberks.gov.uk/portal>. Alternatively, you can complete our comments form and submit your comments via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning

Policy Team, Planning and Countryside, West Berkshire Council, Market Street,
Newbury, RG14 5LD.

If you have any queries on the Housing in the Countryside policies please contact the
Planning Policy Team using the contact details below.

Notification of the adoption of our revised Statement of Community Involvement

The Council adopted its revised Statement of Community Involvement (SCI) on 18th
September 2014. It replaces the SCI originally adopted in 2006. The SCI sets out the
Council's policy for involving the community in

- the plan making process such as Development Plan Documents, Supplementary
Planning Documents and the Community Infrastructure Levy and
- in the consideration of planning applications within the District.

Copies of the SCI, adoption statement and summary of representations received as
part of the consultation process are available on our website:

www.westberks.gov.uk/localplan. The documents are also available for inspection at
the Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am,
and 5:00pm on Mondays to Thursdays, and 8:30am to 4:30pm on Fridays and through
all public libraries in the District during their normal opening hours.

Regards

Gary Lugg

Head of Planning and Countryside

Planning Policy Team

Planning Policy, West Berkshire Council, Market Street, Newbury, RG14 5LD

(01635) 519111 | Ext 2111 | planningpolicy@westberks.gov.uk

www.westberks.gov.uk

www.westberks.gov.uk/planningpolicy

Housing Site Allocations Development Plan Document (DPD) Preferred Options

Housing in the Countryside Policies

Ref: (For official use only)
Comments should be returned by Friday 31st October 2014:

Via our consultation portal at the Council's website: <http://consult.westberks.gov.uk/portal>

By post to: Planning Policy, Planning and Countryside, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD

By e-mail to: planningpolicy@westberks.gov.uk

By fax to: 01635 519408

This form has two parts –

Part A – Personal details

Part B – Comments on the Preferred Options of the Housing Site Allocations DPD

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Do you want to be kept informed on the progress of this DPD? Yes/ No
 If so please make sure you provide an e-mail address above

Part B - Please use a separate response sheet for each comment

The DPD will be examined by an independent inspector whose role includes assessing whether the plan is sound. For the Housing Site Allocations DPD to be sound it should be:-

- **Positively prepared** – the plan should seek to meet the housing requirement for the District based on the policies set out in the adopted Core Strategy;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective working on cross-boundary strategic priorities;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

We are therefore seeking your views on the soundness of the DPD Preferred Options. Your comments will be published on our Local Plan Consultation Portal and should be planning related. The Council has a duty not to accept comments of a discriminatory nature.

<p>To which part of the document does this comment relate? Please specify the section or policy on which you are commenting.</p>	<p>Section.....</p> <p>Policy.....</p>
<p>Do you consider the preferred policy approach/option to be sound</p>	<p>Yes/ No</p>

Please give your reasons and, if objecting, please indicate what changes you are seeking or what would be your preferred alternative policy approach/option.

Please continue on separate sheet

19 September 2014

Planning and Countryside

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: DPD9 (Housing Site
Allocations) and COM3 (SCI)

Please ask for: Planning Policy Team

Direct Line: 01635 519 111

e-mail:

planningpolicy@westberks.gov.uk

Dear Sir / Madam,

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD):

Part 1 – Site Allocations

The Council is currently preparing its Housing Site Allocations DPD and has recently consulted on the first part of the Preferred Options, which set out smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. The Preferred Options also allocated sites for Gypsies, Travellers and Travelling Showpeople and set out revised policies for the Sandford Park strategic site allocation and residential parking policy for new development. The consultation has now closed and the comments are currently being analysed.

Part 2 - Housing in the Countryside Policies: Preferred Options Consultation

We are now consulting you for your views on the second part of the Housing Site Allocations DPD which is our Housing in the Countryside Policies (Preferred Options). These policies will manage housing development in the countryside of West Berkshire and all relate to housing and the potential to convert or redevelop existing buildings to housing. They have been produced taking into account national and local policy and evidence gathering. The policies, when adopted, will replace a number of the policies from the West Berkshire District Local Plan 1991-2006 which are currently 'saved'.

The Housing in the Countryside Policies are subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period on our Housing in the Countryside policies between **Friday 19 September and Friday 31 October 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapolicies.

[How to comment on the consultation:](#)

The Housing in the Countryside policies are available to view online on the Council's website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection through all public libraries in the District during their normal opening hours.

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If you have any queries on the Housing in the Countryside policies please contact the Planning Policy Team using the contact details above.

Notification of the adoption of our revised Statement of Community Involvement

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- the plan making process such as Development Plan Documents, Supplementary Planning Documents and the Community Infrastructure Levy and
- in the consideration of planning applications within the District.

Copies of the SCI, adoption statement and summary of representations received as part of the consultation process are available on our website: www.westberks.gov.uk/localplan. The documents are also available for inspection at the Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am, and 5:00pm on Mondays to Thursdays, and 8:30am to 4:30pm on Fridays and through all public libraries in the District during their normal opening hours.

Keeping you informed

You are receiving this correspondence because you have either asked to be listed on our consultation database or you responded to a previous consultation. If you are receiving this letter in hard copy I would be grateful if you could send us an email address so that we can amend your contact details and contact you electronically in the future. Should you no longer wish to be kept informed then please contact a member of the Planning Policy team.

Yours faithfully,



Gary Lugg
Head of Planning and Countryside

From: [PlanningPolicy](#)
To: [PlanningPolicy](#)
Subject: West Berkshire Local Plan : Consultation on Policies for Housing in the Countryside
Date: 19 September 2014 15:04:46
Attachments: [image003.jpg](#)

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD)

Part 1 – Site Allocations

The Council is currently preparing its Housing Site Allocations DPD and has recently consulted on the first part of the Preferred Options, which set out smaller scale housing sites to meet the remainder of the 'at least' 10,500 housing figure identified in the adopted Core Strategy DPD. The Preferred Options also allocated sites for Gypsies, Travellers and Travelling Showpeople and set out revised policies for the Sandford Park strategic site allocation and residential parking policy for new development. The consultation has now closed and the comments are currently being analysed.

Part 2 - Housing in the Countryside Policies: Preferred Options Consultation

We are now consulting you for your views on the second part of the Housing Site Allocations DPD which is our Housing in the Countryside Policies (Preferred Options). These policies will manage housing development in the countryside of West Berkshire and all relate to housing and the potential to convert or redevelop existing buildings to housing. They have been produced taking into account national and local policy and evidence gathering. The policies, when adopted, will replace a number of the policies from the West Berkshire District Local Plan 1991-2006 which are currently 'saved'.

The Housing in the Countryside Policies are subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period on our Housing in the Countryside policies between **Friday 19 September and Friday 31 October 2014**. All consultation material is available on the Council's website at www.westberks.gov.uk/hsapolicies.

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How to comment on the consultation:

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Regards

Gary Lugg

Head of Planning and Countryside

Planning Policy Team

Planning Policy, West Berkshire Council, Market Street, Newbury, RG14 5LD

(01635) 519111 | Ext 2111 | planningpolicy@westberks.gov.uk

www.westberks.gov.uk

www.westberks.gov.uk/planningpolicy

From: [PlanningPolicy](#)
To: [PlanningPolicy](#)
Subject: West Berkshire Local Plan : Consultation on Policies for Housing in the Countryside
Date: 19 September 2014 15:09:40
Attachments: [image003.jpg](#)

Dear Parish Clerk

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD)

Part 1 – Site Allocations

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Regards

Gary Lugg

Head of Planning and Countryside

Planning Policy Team

Planning Policy, West Berkshire Council, Market Street, Newbury, RG14 5LD

(01635) 519111 | Ext 2111 | planningpolicy@westberks.gov.uk

www.westberks.gov.uk

www.westberks.gov.uk/planningpolicy

From: [PlanningPolicy](#)
To:
Cc: [PlanningPolicy](#)
Subject: West Berkshire Local Plan : Consultation on Policies for Housing in the Countryside
Date: 19 September 2014 15:21:29
Attachments: [image003.jpg](#)

Dear Corporate Directors and Heads and Service

Please pass this email on to any relevant member of staff.

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD)

Part 1 – Site Allocations

The Council is currently preparing its Housing Site Allocations DPD and has recently consulted on the first part of the Preferred Options, which set out smaller scale housing sites to meet the remainder of the ‘at least’ 10,500 housing figure identified in the adopted Core Strategy DPD. The Preferred Options also allocated sites for Gypsies, Travellers and Travelling Showpeople and set out revised policies for the Sandleford Park strategic site allocation and residential parking policy for new development. The consultation has now closed and the comments are currently being analysed.

Part 2 - Housing in the Countryside Policies: Preferred Options Consultation

We are now consulting you for your views on the second part of the Housing Site Allocations DPD which is our Housing in the Countryside Policies (Preferred Options). These policies will manage housing development in the countryside of West Berkshire and all relate to housing and the potential to convert or redevelop existing buildings to housing. They have been produced taking into account national and local policy and evidence gathering. The policies, when adopted, will replace a number of the policies from the West Berkshire District Local Plan 1991-2006 which are currently ‘saved’.

The Housing in the Countryside Policies are subject to a Sustainability Appraisal (SA) and must also be prepared in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive. An SA/SEA Environmental Report has therefore been produced alongside our Preferred Options for consultation.

We are holding a six week informal consultation period on our Housing in the Countryside policies between **Friday 19 September and Friday 31 October 2014**. All consultation material is available on the Council’s website at www.westberks.gov.uk/hsapolicies.

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How to comment on the consultation:

The Housing in the Countryside policies are available to view online on the Council’s website as outlined above. Hard copies are available for public inspection at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. They will also be available for inspection through all public libraries in the District during their normal opening hours.

We encourage you to submit any comments that you might have on the Housing in the

Countryside Policies online at <http://consult.westberks.gov.uk/portal>. Alternatively, you can complete our comments form and submit your comments via email to planningpolicy@westberks.gov.uk, by fax 01635 519 408; or by post to the Planning Policy Team, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD.

If you have any queries on the Housing in the Countryside policies please contact the Planning Policy Team using the contact details below.

Notification of the adoption of our revised Statement of Community Involvement

The Council adopted its revised Statement of Community Involvement (SCI) on 18th September 2014. It replaces the SCI originally adopted in 2006. The SCI sets out the Council's policy for involving the community in

- the plan making process such as Development Plan Documents, Supplementary Planning Documents and the Community Infrastructure Levy and
- in the consideration of planning applications within the District.

Copies of the SCI, adoption statement and summary of representations received as part of the consultation process are available on our website: www.westberks.gov.uk/localplan. The documents are also available for inspection at the Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am, and 5:00pm on Mondays to Thursdays, and 8:30am to 4:30pm on Fridays and through all public libraries in the District during their normal opening hours.

Regards

Gary Lugg

Head of Planning and Countryside

Planning Policy Team

Planning Policy, West Berkshire Council, Market Street, Newbury, RG14 5LD

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www.westberks.gov.uk

www.westberks.gov.uk/planningpolicy

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Planning Policy Team

19 September 2014

Planning and Countryside

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: DPD9 (Housing Site Allocations) and COM 3 (Statement of Community Involvement)

Please ask for: Planning Policy Team

Direct Line: 01635 519 111

e-mail:

planningpolicy@westberks.gov.uk

Dear Sir/Madam,

Housing in the Countryside Policies, Housing Site Allocations Development Plan Document Preferred Options Consultation and Adoption of the Statement of Community Involvement

Between Friday 19 September and Friday 31 October 2014, West Berkshire Council will be consulting on the Preferred Options Housing in the Countryside Policies, which form part 2 of the Housing Site Allocations Development Plan Document (DPD) Preferred Options.

As part of the consultation process the Council needs to make all relevant documents available for reference at all public libraries across the District until Friday 31st October 2014. I would therefore be grateful if you could display the enclosed Housing in the Countryside Policies Housing Site Allocations DPD Preferred Options together with this memo until Friday 31 October please.

Additionally, the Council adopted its revised Statement of Community Involvement (SCI) on 18th September 2014.

As part of that process the Council also needs to make all relevant documents available for reference at all public libraries across the District. I would therefore be grateful if you could keep the copy of the SCI, the adoption statement and the summary of representations received as part of the consultation process as permanent reference copies.

Further details on both documents are provided below; however any queries should be directed to the Planning Policy Team using the contact details above.

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Covering letter to Southcote Library and Tilehurst Library

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Yours faithfully,

Planning Policy Team

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - Chapter 1: Introduction

Responses received: 88

1. General comments

Responses received: 2

Consultation comments:

- The proposed timetable does not allow the council to perform all of the necessary quality checks.
- Concern regarding process of Council decision making.

Council response:

The timetable for production of the Housing Site Allocations DPD is set out in the agreed Local Development Scheme. The Council amended the timetable following the consultation on preferred options, as a result of the high number of representations. The work on the DPD has been carried out to meet statutory requirements and will be tested at Examination.

Decision making processes have followed those set out in the Council's constitution.

2. Approach to Housing Numbers

Responses received: 38

General housing requirements

Consultation Comments:

- Questions on who the new homes will be for, whether for people who work in West Berkshire or for commuters and people migrating from London.
- The housing problem is worsened by an ineffectively controlled immigrant policy.
- The housing target and overall numbers are far too high.
- More investment is needed in the Midlands, North West and Yorkshire. Re-industrialisation of these areas would improve the overall health of the nation rather than further degrading the quality of life in London and Thames Valley through poorly thought out regional and national strategy.
- There is enough housing in the area – concerns that additional housing will make roads busier and more hazardous and increase crime.

- Concerns about use of “at least 10,500” and ‘additional flexibility’. Should be a firm figure set and not changed.
- Confirmation sought that “at least” 10,500 is fixed to 2026 and wish to see definition of ‘additional flexibility’
- Which figure takes preference, the Core Strategy figure of 10,500 homes or the figure for each spatial area?
- What is the total number of homes already built, under construction or with planning permission?
- If other authorities within the South East region have exceeded their quota will it make any difference to the quota allocated to West Berkshire?
- Not enough building and system too slow. Do everything you can to ensure every possible piece of land can be used to provide competitive private housing.
- Primary requirement is for smaller homes located near to local work opportunities
- No evidence of West Berkshire’s need being met in adjoining districts as a result of Duty to Cooperate.
- DPD does not appear to allocate new homes that will exceed the 10,500. What measures are in place for additional required houses requested from central government?

Council response:

New homes will be needed to meet both the natural growth of the population, to provide homes for newly forming households and to meet anticipated net migration. Those occupying new homes may work in West Berkshire, elsewhere in the housing market area or beyond. The minimum requirement for additional dwellings up to 2026 is set out in the adopted Core Strategy. Any new requirement will need to take account of the objectively assessed needs (OAN) identified in the Strategic Housing Market Assessment (SHMA) which may well show an increased need for housing in the District.

Policies on international migration and on regional investment decisions are beyond the scope of this DPD.

The figure in the Core Strategy is “at least 10,500” and cannot be a firm figure or a figure fixed till 2026. The Council will be preparing a new Local Plan with a revised housing requirement following adoption of this DPD and this will need to take account of the latest evidence. The Council needs to allow for flexibility in the housing numbers as it is not possible to be precise. Some sites may not come forward as expected and additional windfall sites may become available but the

Council needs to ensure that there are sufficient allocations of land for housing to meet at least the Core Strategy requirement.

The DPD needs to show that the overall housing requirement in the Core Strategy can be met. The Area Delivery Plan Policies set out the approximate number in each spatial area but if that number cannot be met in one area then additional development would need to be allocated elsewhere in the District.

The total number of homes built, under construction or with planning permission is set out in the latest Annual Monitoring Report (AMR). The Background Paper accompanying the preferred options consultation also set out the position on completions and permission in each spatial area at the time of publication and will be updated for the Draft Submission DPD.

The housing requirement for West Berkshire is not affected by whether other authorities in the region are meeting or exceeding their housing requirements. Housing requirements are no longer set through a regional plan (or from a central government request) but by individual authorities through their own Local Plan, based on evidence of need.

The Core Strategy requirement is to be met within the District. The Duty to Cooperate on housing requirements will apply to the work to be carried out on the preparation of the new Local Plan.

Support for increased house building is noted.

The Core Strategy contains a policy on housing types and mix which states that the mix should have regard to the character of the area, the accessibility and availability of services, facilities and infrastructure and the evidence of housing need. The SHMA will be assessing the need for different types and sizes of homes.

3. The Evidence Base – identifying sites

Consultation comments:

- Questions on whether enough is done to identify available sites, including spaces above shops, redundant institutions, warehouses etc.
- No allowance in the housing allocation for offices being converted into homes, in addition to those already approved. There are large numbers of empty offices throughout the district. Many locally based organisations, such as Vodafone and the Council itself, are encouraging employees to work from home thus reducing the need for office space. This reduced demand is likely to result in more applications to convert, or re-build, offices into homes which will reduce the need for new housing areas in the countryside.
- No assessment of Protected Employment Areas and their boundaries has been carried out. An excess of employment land above that required by the current

population will result in more people moving to the District and increasing the demand for housing. An assessment would be likely to enable release of land for housing.

- No allowance has been made for empty homes being brought back into use
- Question whether enough inspection made of sites under consideration, including liaison with utility providers, geologists etc.
- The approach taken to considering the potentially developable sites in the SHLAA as preferred allocations is inconsistent and not based on any robust evidence base.
- There is no evidence explaining the changes in housing density numbers between the Assessment Form and the DPD, for instance Site BUR015 has been assessed at a dwelling population of 287, the parish council suggest 50 and the DPD approves 105.

Council response:

Sites have been identified in the Strategic Housing land Availability Assessment (SHLAA), which sought to identify as many potential sites for housing as possible. A "Call for Sites" requested details of any sites which would have housing potential, whether within or outside of settlement boundaries. Opportunities such as those for housing above shops tend to come forward as windfalls and are difficult to identify in advance. A windfall allowance has been included in the figures for the first part of the plan period.

A number of schemes for change of use or redevelopment of offices to housing are included in the figures, where there is a planning permission or where they have been identified as having potential through the prior approval process. In addition, the windfall allowance is based on past trends which will include changes of use from office to residential on sites that were not previously identified. The Council will be carrying out an assessment of economic needs, including need for office space, as part of the evidence base for the new Local Plan.

The opportunities for re-designation of the Protected Employment Areas will be considered through the new Local Plan on the basis of up to date evidence. The assessment of economic needs will look at the economy in the functional economic market area, which may be wider than the local authority area.

The Council has insufficient evidence on empty homes to demonstrate that empty homes had not been counted in the existing stock of dwellings when establishing the South East Plan housing requirement on which the Core Strategy requirement was based.

The Council have liaised with infrastructure providers and other service areas in assessing sites for potential allocation in the DPD.

The SHLAA can be seen as the first stage of the assessment. Where sites were assessed as not currently developable they were considered to have significant constraints that meant the sites were unlikely to come forward in the plan period. Potentially developable sites were those which are contrary to current policy and would need to be further assessed through the plan-making process. These were assessed on a consistent basis and evaluated through a sustainability appraisal process as outlined in the Background Paper.

The SHLAA sites were generally based on a density multiplier to establish a potential housing requirement. In some cases the sites proposed for allocation were smaller than the submitted site and hence the development potential was reduced, as for BUR015

4. The Evidence Base – housing supply and need

Consultation comments:

- There is a lack of a robust, transparent, comprehensive evidence base to justify and effectively demonstrate how the Council accounts for planning permissions, identified sites and windfall allowance and how these contribute towards meeting the housing requirement. No guarantee that the identified sites and windfalls will come forward as predicted.
- Anticipated that the DPD would include an updated estimate of housing requirements, but this is absent from the draft.
- The Council needs to set out clearly how many housing units have already been approved as total may already be near or over the 10,500 target.
- If identified sites are to be relied on, local planning authority will need to provide robust, up to date evidence to support deliverability. The Council has not provided such evidence to support their reliance on SHLAA sites.
- The viability and delivery trajectories of sites need to be considered. Preferred allocations need to be viable with every likelihood of delivery during the Plan period compared to the discounted sites
- Flexibility in the figures is countered by the fact that dwellings on preferred options sites are presented as 'up to' figures, suggesting capacity may be lower.
- Question whether there is a survey to record housing needs relative to population growth and needs of different groups

Council response:

Data on planning permissions and information on the identified sites and windfall included within the supply was set out in the Background Paper. This will be updated for the draft submission DPD with further information on the windfall allowance and the identified sites that will contribute to the supply. There can never be a guarantee that any site will come forward but the windfall allowance is based on a robust assessment of past delivery trends.

Information on potential phasing of sites and delivery trajectories will be considered in drawing up the draft submission DPD and in the assessment of the five year housing land supply. The sites to be included within the DPD are considered to be capable of delivery within the plan period, the purpose of this plan being to boost the supply of housing in the short to medium term.

The development potential is expressed as an approximate figure and there is potential for the numbers on any site to vary slightly, depending on the site constraints, opportunities and detailed design.

The Strategic Housing Market Assessment (SHMA) will assess overall housing need and the needs of different sectors of the community. The SHMA will be available before the Draft Submission Housing Site Allocations DPD is published for consultation.

5. Housing Delivery in the Newbury and Thatcham area

Consultation Comments

- Has been a serious under delivery of housing at Newbury over past 7 years- only 1,252 completions between 2006/07 – 2012/13 – accumulated shortfall of 638 dwellings. This is due to failure to allocate sufficient land in a timely manner. Believe the proposals repeat the mistakes of the past by failing to allocate an adequate supply of sites that can be delivered in the short term and accumulated backlog of unmet housing need will continue to increase. Entirely at odds with NPPF objective. Preferred Options allocates only 35% of the residual requirement in Newbury, relying on majority of residential requirement from un-allocated sources. That is an unreliable land supply that is unlikely to boost house building in the short term. Need for further allocations of sites in Newbury and contingency allowance of 'reserve sites'.
- Council should be proposing more sites in Newbury due to uncertainty of identified sites and windfalls coming forward – suggestion for 1,000 dwellings to help more fully meet the OAN in the local area.
- London Road Industrial Area - doubts as to whether it will be possible to achieve comprehensive redevelopment in plan period given land assembly and need to re-locate existing occupiers. Site should be treated as a 'windfall' and not relied upon to make any contribution to housing land supply throughout the plan period.

- No adequate consideration of brownfield sites. Schemes already anticipated include Sterling Cables (165 homes) and the Council's own plans for the London Road Estate (300 homes) yet not allowed for in the housing targets.
- The council has obtained funding for a road link associated with the Sterling Cables site and the application is likely to be approved. 165 homes should therefore be deducted from the number to be allocated.
- The DPD does not fully conform to Core Strategy and Area Development Delivery Policies as it does not demonstrate how Newbury and Thatcham are effectively meeting their individual housing requirements.
- Allocations should not be overly constrained by the content of Area Delivery Plan Policy 3 (Thatcham) given the settlement of Thatcham, in particular its western half, has a close functional relationship with Newbury and its associated facilities.
- Approach will continue to target housing delivery at a rate substantially below that required to meet objectively assessed needs across the District and in Thatcham in particular. This is counter-productive to the council's wider objectives which relate to the future of Thatcham.
- In light of Hunston judgement the Housing Site Allocations DPD will not provide a sound basis for resisting applications in Thatcham and will not assist with delivery of infrastructure such as schools and community facilities.

Council response:

Current strategic allocations in the Core Strategy are both located in Newbury; the Racecourse site for up to 1,500 dwellings and Sandleford Park for up to 2,000 dwellings. The Housing Site Allocations DPD seeks to allocate additional smaller sites that will deliver in the short term. It is misleading to say that only 35% of the residual requirement is allocated and that the reliance for the majority of the requirement is from un-allocated and unreliable sources. With approximately 500 dwellings to be allocated in the Newbury/Thatcham area through the Housing Site Allocations DPD, the allocations in this spatial area for the plan period amount to approximately 3,000 dwellings or almost half of the total requirement. Delivery was always anticipated to be lower at the start of the plan period as there will be some delay in bringing forward the larger sites. Delivery is now progressing well on the Racecourse site and the Council anticipate a planning application for Sandleford Park in the very near future. There is only a small number of identified sites included within the supply and the windfall allowance is only included for the first 5 years, based on past trends of permissions and delivery rates. The Draft Submission DPD will ensure that there are sufficient sites to meet the Core Strategy requirement. The objectively assessed need (OAN) from the SHMA will relate to the whole district and the new Local Plan will look at how this can be met.

London Road Industrial Estate is not included within the housing numbers and is therefore not relied upon to make any contribution to housing land supply in the plan period. It will not, however, be classed as a windfall site. It is an identified site, though one which has constraints on its delivery in the short term.

The Sterling Cables site was not included within the housing supply at the time of the preferred options consultation but has since been granted planning permission and will be included in the figures for permissions in the evidence supporting the draft submission DPD.

The evidence to support the draft submission DPD will include information on the housing supply position for the Newbury and Thatcham areas. Allocations will need to broadly meet the housing figures set out in the Core Strategy Area Delivery Plan Policies for Newbury and Thatcham although these are only approximate requirements.

The strategy for Thatcham was examined as part of the Core Strategy and found sound. The objectively assessed needs will not relate to individual settlements and the strategy to meet the OAN will be established through the new Local Plan, which will also consider what infrastructure would be needed to support any proposed higher levels of growth.

6. Housing Delivery in the AONB

Consultation comments:

- The Landscape Capacity work undertaken by the Council at the time of the Examination of the Core Strategy confirmed that there is capacity to accommodate more than the 2,000 dwellings within the AONB without causing harm to the natural beauty of the area. The need for a contingency allowance applies as much to the AONB as it does to the rest of the District and there is no reason why the DPD should not provide for such an allowance.
- The number of sites allocated for the North Wessex AONB is not sufficient to satisfy the requirement for this area. This is due to the number of windfall units that have been included in the overall supply. No evidence has been included to justify that 369 windfall units will be delivered in 12 years. The same approach as for the other spatial areas should be taken. An extra 103 homes should be planned for in the AONB.

Council Response

The Core Strategy Inspector recommended that the housing requirement for the AONB be limited to 'up to 2,000 dwellings' in order for the strategy to be found sound. Provision at this scale is subject to the overarching objective for the AONB for the conservation and enhancement of its special landscape qualities. Though the

landscape work for the Core Strategy identified sites which could be developable, the cumulative impact of development also needs to be considered.

The windfall allowance in the housing supply figures is based on monitoring of windfall permissions over a number of years. Evidence on the windfall allowance will be included in the supporting information to the DPD. The AONB policy for provision of **up to** 2,000 dwellings up to 2026 is considered to justify the inclusion of a windfall allowance for the entire plan period.

7. Housing Delivery in Eastern Area

Consultation comments:

- In Eastern Area, at March 2013, only 283 dwellings had been completed, while a further 427 were subject to an extant planning permission, leaving a residual requirement of at least 690 dwellings. However if South Lakeside scheme comes forward at a lower density as seems likely, the residual requirement will be greater than estimated. There is a need for other sites to be allocated to ensure continuing supply
- Core Strategy Inspector did not view the approximate 1,400 homes figure as a maximum and rigid adherence to this figure would be inappropriate. Sites should be identified even where the figure of 1,400 would be exceeded and references should state that the requirement is for 'at least 1,400 dwellings'.

Council response:

The housing figures for the Eastern Area could be affected by any new planning application for South Lakeside but there are significant constraints to development in the Eastern Area. The requirement is for approximately 1,400 dwellings, not at least 1,400 in the spatial area. The reason for not specifying this figure more precisely was to enable flexibility to allocate sites in the most sustainable manner.

8. Approach to DPD and meeting the OAN

Consultation comments

- Housing Site Allocations DPD is based on out of date housing requirements. Core Strategy requirement was based on the South East Plan which has now been abolished.
- Most up to date housing projections from the DCLG show an expected household growth of 710 dwellings per annum and average household size has decreased. Housing needs have been significantly underestimated.
- No up to date SHMA to inform any current housing target. Without up to date SHMA the Council does not have a clear understanding of housing needs for the

District and cannot be confident that the DPD will allocate sufficient housing land to meet the need.

- Meeting the OAN is part of preparing a 'positively prepared' plan. In the absence of a SHMA the housing targets should be based on the latest DCLG housing projections.
- Though judgement in Gladman Developments Ltd v Wokingham Borough Council supports the Council's approach in legal terms, it does not change the implications of the Hunston Court of Appeal judgement that confirmed that housing targets from a revoked Regional Strategy cannot be taken to represent the full OAN. Housing Site Allocations DPD cannot provide a five year supply of land that complies with paragraph 47 of the NPPF and will therefore not be effective in preventing the delivery of non-allocated sites.
- Council's efforts should be put into updating Local Plan and Housing Site Allocations DPD postponed until after the Local Plan has been adopted.
- Misguided to continue with a Site Allocations process which is out of date before it has begun. LPA should first review the Core Strategy, and in particular establish the full OAN for market and affordable housing (as required by Paragraph 47 of the NPPF). Site allocations process should not have been undertaken until that had been done. Council's approach does not justify the development of a new DPD which is contrary to the NPPF's basic requirements.
- Core Strategy Inspector made no reference to interim Site Allocations Document designed to allocate the Core strategy figure in advance of establishing objectively assessed needs but intended housing sites to meet full OAN for the housing market area to be allocated in new local plan to replace Core Strategy.
- Evident that Council cannot demonstrate a 5 year supply of deliverable housing sites based upon objectively assessed need, therefore clear that policies for supply of housing included in the Core Strategy must be considered out of date for decision making purposes and that same view should be taken for plan making purposes.
- SA fails to provide sufficient justification to exclude Option 4 (New Local Plan based on new housing number) – fails to outline the significant positives of Option 4 and negatives of other options such as failing to maximise opportunities for communities that could be gained via larger scale developments.
- The new Local Plan is unlikely to be adopted before 2018. The Council's assessment of housing land supply will therefore have been based for at least 12 years on what is already known to be a demonstrably inadequate requirement figure.

- Plan not effective as sites may not be the most suitable sites for delivering the full OAN.
- Support for Council's desire to increase housing land supply in a plan-led way. With work progressing on the SHMA and not likely to be concluded until 2015, progressing housing allocations in line with the spatial strategy in the Core Strategy appears to be the only available option. The preparation of the Housing Site Allocations DPD whilst reviewing the objectively assessed needs and working towards a new local plan is a pragmatic approach to delivering genuinely plan-led development in the district which is sound and in accordance with the Inspector's recommendations from the examination of the Core Strategy. This approach will assist the Council in delivering much needed housing sites in the short term and avoid undue reliance on a handful of large sites
- Reading Borough Council intends to work jointly with West Berkshire Council and other local authorities in identifying the objectively assessed housing needs across the housing market area.
- The 'flexible' approach would be to consider allocating additional land now to ensure the supply is maintained through to the adoption of the new local Plan estimated to be in 2018 rather than another interim measure
- The DPD can only have short life-span and needs to focus on sites capable of delivery in the short term.
- If the Council is unwilling to increase the housing provision within the Housing Site Allocations DPD, it must be made explicit that the Housing Site Allocations DPD plays no role in the exercise required by paragraph 47 of the NPPF. Clearly, the risk of not planning for the full objectively assessed needs now is that the Council will render the newly adopted DPD as "not up to date" and they will be faced with planning applications seeking to address the housing shortfall. The Housing Site Allocations DPD should acknowledge that additional sites will need to come forward in order to ensure that the level of provision reflects the full, objectively assessed need within the District.
- Suggest that Housing Site Allocations DPD fully meets identified remaining housing need and that any windfall development can be viewed as a bonus contribution to the future housing needs.
- With risk that when SHMA concludes the Core Strategy and Housing Site Allocations DPD could quickly become outdated, it is important that the DPD identifies a quantum of sites in excess of the minimum total identified in the Core Strategy that are immediately developable.
- Should be a contingency policy or interim site release policy to allow for further development to ensure a 5 year housing land supply

- Suggestions for reserve sites of 10 or 20% as contingency allowance – one suggestion for at least 10% of overall requirement to be released when housing land supply drops below 5.25 years or when updated OAN has been established.
- DPD should apply a 10% non-implementation rate to planning permissions and prior approvals.

Council response

The approach to the Housing Site Allocations DPD was set out in the Background Paper accompanying the preferred options consultation. The housing requirement came from the South East Plan. A new Local Plan will need to meet the objectively assessed needs for housing as far as is consistent with the policies in the National Planning Policy Framework (NPPF). The Council has given its reasons for proceeding with the Housing Site Allocations DPD. It believes this approach to be the most effective means of boosting housing supply in the short to medium term, in a plan led manner, in accordance with the spatial distribution that had been found sound at the Core Strategy examination. The Council did not want to wait for the SHMA to be completed and a new Local Plan prepared, before allocating additional housing sites. Though this approach has been advocated by a number of planning agents, waiting for the SHMA would only have delayed delivery and encouraged speculative planning applications. The approach is therefore to allocate additional sites that are needed to boost the supply now. The Planning Inspectorate has indicated that this is a pragmatic and reasonable approach to take and there has been support from some consultees.

The approach is that envisaged by the Core Strategy Inspector. He was clear that one of the positive features of a sound Core Strategy was that it would enable further allocations for housing, even though such allocations may need to be supplemented following a review of the Core Strategy (Inspector's Final Report paragraph 39). He did not envisage delaying the allocation of the non-strategic housing sites until the two stage process of carrying out a SHMA and reviewing the scale of housing provision within the District had been carried out.

The SA/SEA of the approach to the DPD does highlight several positives of the alternative approach of a new Local Plan based on a new housing number. These were not considered to be sufficient to outweigh the significant positive effects of the HSA DPD option on the provision of market and affordable housing in the short term, to aid delivery and ensure a five year housing land supply. The Core Strategy had already allocated strategic sites; the immediate need is to allocate smaller sites that can deliver quickly and to enable development in some of the settlements that would not be suitable for large scale developments.

A SHMA is now complete and the outcomes of the study will be available before the DPD is considered by the Council and published for a period of statutory consultation. The SHMA is using the most up to date information, using as a starting point the DCLG household projections that were published in February 2015. These projections replace those that were current at the time of the consultation on the preferred options. The intention is that the DPD will meet the first part of the needs identified through the SHMA and will allocate sites to help demonstrate the five year housing land supply. It will therefore be a positively prepared plan for the short to medium term, even though it may not meet the full OAN for a longer time period.

Additional sites to meet the longer term requirement, based on the OAN, will come forward through the new Local Plan.

A number of representations have questioned whether the Council will be able to demonstrate a five year housing land supply in the absence of a revised housing target. The approach will be that outlined in the Planning Practice Guidance (PPG ID 3-030-20140306). In assessing the requirement, where evidence in Local Plans has become outdated, information provided in the latest full assessment of housing needs should be considered, although the weight given to the SHMA will need to take account of the fact that the figures have not been tested or moderated against relevant constraints. On the supply side, the majority of the sites to be allocated in the HSA DPD are anticipated to deliver housing within the five year period and will therefore contribute to the five year housing land supply. The whole aim of the DPD is to boost supply in the short to medium term and is therefore seen as the most effective method for demonstrating a plan-led supply of housing sites.

Though the new Local Plan is unlikely to be adopted before 2018 this does not therefore mean that the assessment of housing land supply will be based on the Core Strategy requirement until then. Account will be taken of the OAN from the SHMA and a revised housing requirement will be agreed at an early stage of preparing the new Local Plan, working with neighbouring authorities in the HMA and consulting with the community.

The Council does not accept that the Core Strategy policies for housing are out-of-date for plan-making purposes. The Council is able to demonstrate a five year supply of housing to meet both the Core Strategy requirement and the latest DCLG household projections. The housing distribution was tested by the Core Strategy Inspector and forms a sound basis for further allocations of land for housing.

Support for the Council's approach to the DPD is noted.

A number of representations have put forward the case for some contingency policy or allowance in the figures. The Housing Site Allocations DPD will allocate sufficient sites to meet the Core Strategy requirement with some flexibility built in. There are some sites that will be proposed for development later in the plan period which could potentially be brought forward if needed to boost the short term land supply. A windfall allowance has only been included for the first five years (other than in the AONB) rather than over the whole plan period. Additional windfall development will therefore boost the supply. It is also anticipated that additional identified sites will come forward which have not been included

The figures for planning permissions and prior approvals set out in the Background Paper do not include a non-implementation allowance. The deliverability of individual sites will be assessed regularly through the preparation of the five year housing land supply.

9. Consultation

Responses received: 33

Consultation comments:

- Process is biased towards West Berkshire Council achieving its own objectives without due consideration to all affected parties
- The period 25 July to 12 September is insufficient for the Council to consult, receive and consider all representations in a fair and balanced manner.
- Deadline is unreasonable given diverse and complex factors to be considered. Request for extension.
- Objections to consultation because it has been carried out in the summer holiday period when most residents are away.
- inadequate attempts have been made to inform residents that it is taking place and about the deadline for receiving response.
- WBC letter was the first notice received – no prior notice and poor communication.
- How many consultation letters have been issued in Mortimer?
- Letters were addressed to ‘the occupier’ rather than named individuals and therefore likely to be thrown away
- WBC needs to ensure that all Parish Councils are given the appropriate guidance on how they should consult with their affected residents in a fair and constructive manner.
- The DPD affects the whole local community and should not be limited only to residents living within 100 metres of the sites in question. The whole community needs to be aware of the consequences of this "fast track" compromised process.
- WBC have sought feedback through an informal consultation, but have made this difficult for residents by using a formal planning application process that is clearly not appropriate and does not constitute a consultation as it is only one way and blind until the consultation period is over.
- Document and procedure for making comment not easily understood. Will comments be ignored if not submitted correctly?
- The Consultation invokes unnecessary emotion by defining these sites as "preferred" development sites; would be better described as "shortlisted potential" development.
- The DPD will need review using independent assessors. Once proven to be sound it should then be put out for public consultation

- The DPD fails to clearly reference important associated documents that are key in both understanding how decisions have been made, and provide an audit trail of supporting evidence e.g. SA/SEA.
- Puzzling that strategic plan agreed and we are now being asked to look again at many sites submitted for strategic plan. Call for Sites seems an odd process, inviting opportunistic landowners/developers to put forward sites most of which are inappropriate.

Council Response

The Council allowed a seven week period for the informal consultation on the DPD preferred options, a week longer than is required for a statutory consultation. Though most of the period coincided with the school summer holidays almost 4,500 people responded and made their views known. It is not felt that many people would be disadvantaged by the timing, particularly as all the information was available online.

The Council used a variety of methods to publicise the consultation, which are set out in the Statement of Consultation. There had been prior workshops with parish and town councils on the potential sites.

The consultation was not limited to those residents living within 100 metres of a preferred options site; the letters were only one of a number of means of notifying residents and it was not felt necessary to write with a prior notice that a letter would be sent. The letters were addressed to 'the occupier' rather than to named individuals as occupiers' names are not available on the geographical information system used and will not always be up to date. It is up to individuals whether to open letters or throw them away unread.

There were 144 consultation letters sent to addresses close to the 2 sites that were identified as preferred options in Mortimer.

The Council had held previous consultations with parish and town councils and kept them informed of the process. They were also sent posters to display and information that could be used in any local newsletter. The preferred options consultation was, however, carried out by West Berkshire Council and officers were available to offer appropriate guidance.

There has been some criticism of the method of presenting the documentation and for making comments. The Council uses a consultation system that is in commonly used by local authorities, particularly for local plan production. It is completely separate from the planning application process and enables consultees to view the documents and make their comments online. We do recognize that not everyone will want to read the documents or submit their comments online. A response form was also available for comments and we have accepted e-mails and letters, many handwritten. Although submission of comments online is the most reliable and

efficient method of making a representation, we have not ignored any comments that were not submitted on the consultation system or on the response form.

The sites were identified as preferred options at this stage; we could have referred to them as shortlisted potential sites but that is not the terminology that is commonly used and could have misled respondents.

The independent review of the DPD is carried out through the plan's examination by a planning inspector. Public consultation is, however, an important part of the evidence base in determining the soundness of the document.

The DPD will reference associated documents and provide an audit trail. At the preferred options stage the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and a background paper were published alongside the preferred options document and were referenced.

The Core Strategy identified and allocated the preferred strategic sites and we need to look at all potential non-strategic sites through the Housing Site Allocations DPD process. These could include sites, or parts of sites, that were considered but not allocated as strategic sites. The 'Call for sites' is a recognised method, recommended by national guidance, for identifying sites which could be available and have potential for development. It is the DPD process that will identify the most suitable for development.

10. Duty to Cooperate

Consultation comments:

- Wokingham Borough Council would welcome the opportunity to discuss any issues associated with development at Burghfield Common and Stratfield Mortimer – consider further information on transport impacts should be provided.
- Network Rail request that the potential impacts from residential development affecting level crossings are specifically addressed through planning policy with policy confirming that the council has a statutory responsibility to consult the rail undertaker where development is likely to result in a material change in the character of traffic using a level crossing, that such applications should be supported by full Transport Assessment and the developer is required to fund any required qualitative improvements. Should the Council choose to develop a residential traveller site next to an operational railway a suitable trespass proof steel palisade fence should be provided. Housing Site Allocations DPD should set out a strategic context requiring developer contributions towards rail infrastructure where significant allocations are identified close to existing rail infrastructure.
- The Highways Agency: Individually, the identified sites due to their size and/or location would be unlikely to materially impact the operation of the strategic road network (SRN). However, consideration should to be given to assessing the

cumulative impact of new proposals together with already planned growth in West Berkshire on the SRN. Smart Motorway Scheme could impact on deliverability of sites in vicinity of the M4.

- Housing Site Allocations DPD fails to be based on effective cross-boundary cooperation taking into account strategic priorities. As it has not been prepared in conjunction with the SHMA it will not address any cross boundary housing issues. No recognition of District's relationship with settlements outside the District.

Council response

The Council will continue to work with neighbouring authorities, statutory bodies and infrastructure providers. The policies in the DPD do not need to repeat national policy or policies in the Core Strategy, for example on the need for transport assessments and travel plans.

Transport assessment work has looked at the cumulative impact of proposals and this work will be published as supporting evidence to the Draft Submission DPD.

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 development plan documents in order to address strategic planning issues relevant to their areas. Work on satisfying the Duty has been ongoing throughout the preparation of the DPD. A Duty to Cooperate Statement has been prepared alongside the DPD which explains how the Council has carried out the Duty throughout the preparation of the DPD. The Housing Site Allocations DPD is prepared as a 'daughter document' to the Core Strategy which has already set a housing requirement and a strategy for the distribution of housing. Key strategic issues were identified for the Housing Site Allocations DPD and details of which bodies were consulted, a summary of the representations, the council's response and subsequent outcomes are outlined in the Duty to Cooperate Statement.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - Chapter 2: Content

Responses received: 33

1. General

Consultation comments

- Need for document to make reference to the inclusion of other uses, such as employment, hotel and potentially retail, as part of appropriate mixed use schemes on sites, to ensure that other appropriate uses are not precluded on suitable sites. Unclear whether there will be subsequent site allocations to deal with other uses.
- Should be acknowledgment in the document that, for affordable housing, viability assessments will be taken into account where thresholds cannot be achieved.
- Environment Agency suggestion to include reference to production of a drainage strategy or to connection to sewerage system in site policies. Need to liaise with Thames Water and potentially update the Infrastructure Delivery Plan
- Thames Water suggestion to include text to policy to ensure that developers demonstrate that there is adequate water supply and sewerage infrastructure capacity.
- Where development is being proposed within 800 metres of a sewage treatment works or within 15 metres of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment and/or noise or vibration impact assessment is required as part of the promotion of the site and potential planning application submission.

Council response:

The primary purpose of the DPD is to allocate sites for housing. This does not necessarily preclude other uses on some of the sites where mixed use development may be appropriate. Site allocations for other uses such as employment will be considered through the preparation of the new Local Plan.

The policy for affordable housing is set out in Core Strategy Policy CS6. This does recognise that where there may be exceptional costs to development the policy may represent a starting point for negotiation. It is unlikely that any of the greenfield sites proposed for allocation in the HSA DPD will involve exceptional costs that would lead to a reduction in the level of affordable housing to be delivered on the site.

The DPD will set out requirements for all sites which will include a water supply and drainage strategy to ensure provision of adequate infrastructure. Detailed requirements will be considered at the planning application stage.

2. Spatial Strategy – where are the houses proposed to go and why?

Reponses received: 8

Consultation comments

- Strategy unsound as focuses on too few rural service villages and does not take account of latest national guidance. In particular East Garston is not included and DPD overlooks villages such as this for modest growth opportunities within plan period. This can lead to decline in provision of facilities as rural housing is essential in ensuring viable use of local facilities. National Planning Policy Guidance (NPPG) recognises that all settlements can play a role in delivering sustainable development in rural areas and advocates against highly restrictive policies such as the Spatial Strategy and the Settlement Hierarchy.
- Sites in and around Donnington are closer to Newbury town centre than some of the shortlisted Newbury sites yet no objective assessment of alternative options in the vicinity (particularly land south of Donnington Golf Course). Concern that Council have restricted their consideration of sites in and around Newbury to those that have some form of physical connection to the Newbury settlement boundary
- Site promotion supporting allocation of a site in Lower Basildon and extension of settlement boundary
- Objection to piecemeal allocation of small development sites across the district as opposed to delivering a longer term comprehensive site (promoting THA004). Given need for austerity and accountability, the use of local authority resources for negotiations on so many smaller sites would represent unbalanced scale of economy. Would also lead to delays in delivery and limit the overall provision of housing. Many of these allocations will result in sprawl of small rural settlements while eroding surrounding countryside. Allocations in AONB considered inappropriate and unnecessary given availability of brownfield land outside of the AONB at Colthrop, which could also deliver a range of community facilities, including a solution to the level crossing at Thatcham through provision of a bridge.
- Following two strategic housing allocations to the south east of Newbury; Sandlesford Park and Newbury Racecourse, the focus for additional housing growth should be on the north of the town, which has seen no major housing development for two decades, save for 80 dwellings at Yates Copse, approximately 10 years ago. This number is greatly outweighed by the number of

new dwellings constructed in Greenham Parish in the same period. The recent grant of planning permission for a further 40 dwellings at Greenacre Leisure Centre, also in Greenham, only strengthens this point. (Promoting the development of NEW010: land west of Long Lane, Shaw).

- The local infrastructure is struggling to cope with what has already been allocated, and the local planning authority has already acknowledged that its estimates of infrastructure requirements for Sandleford (specifically schools and roads) presented to the Core Strategy Public Enquiry were inadequate.
- Must be clear policy to focus on brownfield development – will make better provision for local needs. Objection to building on open fields
- Environment Agency is satisfied that most of the preferred option sites that include areas of flood risk will not include development in Flood Zone 2 and/or Flood Zone 3. Must be clear in the policy allocation that there will be no development, including essential infrastructure and water-compatible development, within Flood Zones 2 and 3. Alternatively, the flood zone area should be excluded from the allocation boundary. If the sites remain as they are, they would need to be sequentially tested.

Council response:

A number of respondents who are promoting sites in the smaller settlements of the district are questioning the housing distribution strategy of focussing development on the more sustainable settlements included in the settlement hierarchy. This hierarchy forms part of the spatial strategy of the adopted Core Strategy, which was found sound since the publication of the National Planning Policy Framework (NPPF). The strategy does not preclude development in the smaller settlements with settlement boundaries where there may be opportunities for limited infill development. The new Local Plan will need to re-examine the spatial strategy in order to plan for the increased housing numbers in a longer term plan.

The promoter of a large site adjacent to Thatcham has also questioned the approach of allocating smaller sites in a number of settlements as opposed to larger ones which can deliver community facilities. The Core Strategy approach was to provide a range of sites, with allocation of strategic sites adjacent to the main urban area and smaller sites in the settlements identified in the settlement hierarchy. This combination of strategic and smaller sites was considered to aid housing delivery, as smaller sites are capable of being delivered more quickly and are likely to involve a higher number of developers, including more local smaller house builders. Much of the site at Colthrop, which is referred to in the representation, is within flood zones 2 and 3 and was assessed as not currently developable in the Strategic Housing Land Availability Assessment (SHLAA).

The site assessment process undertaken for the Housing Site Allocations DPD has assessed sites on a consistent basis and those assessed as the most sustainable are those that have been taken forward. Sites are proposed both to the north and south of Newbury. Infrastructure requirements are an important consideration and the Infrastructure Delivery Plan will be updated in partnership with service providers.

The Core Strategy does set out that most development will be on previously developed or brownfield land, with a target of 60% of new development on previously developed land. But there are insufficient brownfield sites that can be considered deliverable to be able to rely on these to meet the full housing requirements. The situation will be regularly monitored and the new Local Plan will be based on up to date evidence of both housing and employment requirements.

The Environment Agency comments are noted. The developable areas of the sites will not include any areas within Flood Zones 2 or 3.

3. How have the potential housing sites been selected?

Responses received: 16

Identification of Brownfield Land and Call for Sites

Consultation comments:

- Did the range of sites identified include 'brown field' sites along the Oxford Road, just outside the Newbury DC Boundary? Has the Reading plans been taken into consideration when identifying the impact on local Roads? A large number of new homes have been recently built on Long Lane (Reading BC)
- Questions on 'Call for sites' It would appear that developers have identified greenfield sites that they do not own but recognise as easy targets and then speculated by buying up potential access options. Invites speculative developers and landowners.
- No information on how the call for sites was made. There appears not to have been either a call for, or identification of, brownfield sites which could contribute to possible sites as suggested by the NPPF. Request that either the methodology is made clear if it did include a search for brownfield sites or that such a search is carried out before this document is taken further.
- How many sites identified belong to Englefield Estate - is there a potential conflict of interest with developers/owner identify sites rather than the Council reviewing all options
- Would like the consultation document to state how brownfield sites were identified, if they were sought, and a statement as to the number of sites and how many of the 10,500 new homes will be provided on those sites

Council response:

Brownfield sites have been identified. The Call for Sites asked for site submissions for any site with development potential whether greenfield or brownfield and the Strategic Housing Land Availability Assessment (SHLAA) used these submissions alongside other information to identify as many sites as possible. The process is outlined in Stage 2 of the 2013 SHLAA (paragraphs 3.5 to 3.15) available at www.westberks.gov.uk/shlaa.

The SHLAA only identified sites within West Berkshire but the transport assessments that have been carried out considered transport impacts over a wider area, including western Reading. The model included data on new and permitted developments in order to assess the transport impact of potential allocations.

National guidance suggests use of a Call for Sites to help identify sites that are available for development. The Council would not be able to demonstrate deliverability of a site if the owner was not willing for the site to be developed. The Call for Sites requested details of land ownership and availability along with site details. The plan-led process is intended to introduce more certainty and to reduce the number of speculative applications.

The Call for Sites involved contacting all those on the Local Plan database which includes all those who have previously submitted representations on any Local Plan document or who have requested to be kept informed on the Local Plan. A press release was issued and articles were published in the local newspaper. A Call for Sites form asking for the site information was published and is still available on our website.

Englefield Estate is a major landowner in the eastern part of the District and five of the sites identified belong to the Estate. There is no conflict of interest as the Council has assessed the sites on a consistent basis

The brownfield sites identified are shown in the SHLAA. Not all these have been included in the numbers making up the supply of at least 10,500 new dwellings, as there are questions over the deliverability within the short to medium term for a number of sites. Information on the overall amount of development on brownfield land will be included within the DPD or supporting information.

Site Selection

Consultation Comments

- Berks, Bucks and Oxon Wildlife Trust: A full evaluation of biodiversity impacts is only possible on provision of appropriately detailed up to date habitat and species survey reports, which would be expected to form a part of any subsequent planning application. The Trust expects that the Council will have regard to biodiversity during the subsequent planning process.

- To enable Thames Water to provide more specific comments on the site proposals we would value indication of the type and scale of development, the anticipated timing/phasing of development. Consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and sewerage/wastewater infrastructure to serve development proposals.

In general terms, Thames Water's preferred approach for growth is for a small number of large clearly defined sites to be delivered rather than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades.

The impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We also wish to highlight the opportunity to introduce sustainable urban drainage systems into brownfield development to reduce surface water flows into the sewers.

- English Heritage welcomes the inclusion of Battlefields and Historic Parks and Gardens as factors that make sites unsuitable for development in the site selection criteria. We also welcome the identification of archaeology, conservation areas, listed buildings and scheduled ancient monuments as further considerations and are pleased that the Council has rejected a number of sites because of potential harm to heritage assets. However, these considerations should have included non-designated historic landscapes (perhaps these are included under "archaeology"? We welcome the references to Historic Landscape Character Assessment in the Sustainability Appraisal site assessment).
- The Berkshire Local Nature Partnership were pleased that considerations of some natural services/ benefits were included within the selection process including Landscape, Green Infrastructure provision (in terms of access to open space), water supply, minerals and waste.

However no consideration was given to other natural services e.g.; carbon sequestration, noise reduction (from major roads etc), improved air quality, flood management, climate regulation, community cohesion, food production.

In the background information, appendix 1B states that consideration was given to Protected Species but NOT Protected Habitats. Section 41 of the NERC Act 2006 provides a list of both habitats of principle importance, and species of principle importance. These should both be considered in any strategic plan.

The data and evidence used to make the considerations listed in the Background Information needs to be provided. Many of the environmental considerations

have not been justified in this document; this should be amended so that is clear why each one is being considered.

The SA/SEA, Appendix 2. Baseline information includes reference to Countryside Character Areas. These are now out of date and have been replaced by Natural England's National Character Areas (available from <http://www.naturalengland.org.uk/publications/nca/default.aspx>).

SA/SEA section 3.2 Biodiversity. No references are provided as to where the data for Figure 7 has come from. This is required in order to ascertain whether is up-to-date. Similarly, what data and evidence was used in order to satisfactorily consider the impact of the development site to access to open space, ancient woodland, TPOs, LWSs, NR and BOAs?

Local Wildlife Site data is missing.

There is no reference to data on NERC Act (2006) Species of principle importance and habitats of principle importance. If this was considered as stated in the Background paper, Section 2.12, then what data were these considerations based on?

Biodiversity Opportunity Areas have been identified in order to maintain a functioning habitat network throughout the county. How was the impact of each development site on habitat networks considered?

- Lack of clear evidence to support or indicate reasons for preference of the selected sites leads Natural England to consider that this document is unsound. How have these sites been arrived at, what alternative sites have been considered, the document does not make this clear. Comments on individual sites are summarised in the relevant sections of the Consultation Statement .

Natural England General Comments upon the River Kennet SSSI and River Lambourn SSSI/SAC:

- New developments within a 2km distance of the River Lambourn SSSI/SAC, including housing applications and any associated infrastructure, must provide suitable information to allay concerns over impacts to the designated sites mentioned. Resultantly, applications within this distance will be required to submit the following information in the form of a Drainage Strategy:
 - Developments should consider the potential for local hydrological connections to designated sites, both natural and through links such as surface drains. Where connections are found an assessment of the potential risk should be undertaken considering the scale and severity of impacts, and outlining any suitable mitigation measures that will be implemented to minimise or mitigate against this risk;
 - Large developments or developments in close proximity to the designated sites must consider local drainage routes, with a discussion of any

- appropriate mitigation required. Mitigation should relate to both chemical (i.e. pollution) and physical (i.e. alteration to hydrological regimes) impacts on the designated sites mentioned;
- All developments within this 2km buffer should be including Sustainable Urban Drainage Systems (SUDS) elements into their designs. These SUDS should be appropriately designed in relation to local hydrological and hydrogeological conditions to ensure maximum efficiency. The incorporation of SUDS will help to reduce runoff rates in the area, as well as minimising cumulative impacts.
- Site selection process indicated in Appendix B is a sound and thorough process which will identify the most suitable and sustainable development sites
 - Have the meetings and comments from technical consultees been made public – should these not form part of the consultation

Council response:

Biodiversity aspects will be thoroughly considered at the planning application stage. The site policy will make this clear.

The DPD will contain more information on the housing mix and the anticipated phasing of sites.

The Core Strategy policy is for a mix of strategic and smaller sites. A number of the sites proposed in the HSA DPD are medium sized sites which should simplify the delivery of necessary infrastructure upgrades. The proposed sites are mainly greenfield sites as there are insufficient suitable brownfield sites to demonstrate deliverability of the required housing. The Core Strategy was clear that greenfield allocations would be needed in each spatial area.

English Heritage support noted. Any non-designated historic landscapes would have been considered in the SA/SEA within the archaeology comments.

The comments from the Berkshire Local Nature Partnership are noted. The sites assessments including the SA/SEA did consider aspects such as noise impact, air quality and contributions to climate change. For most of these issues there was little to differentiate one site from another in terms of likely impacts. Consideration was given to both protected species and protected habitats and the Council's ecologist was consulted on all sites. His advice was sought on the potential impacts on habitat networks, how any impact could be mitigated and what further assessments would be needed to support any planning application.

The SA/SEA has been updated with reference to Natural England's Character Areas. The assessments refer to data sources where appropriate and the SA/SEA makes the decision making process clear. The biodiversity information has come from Natural England and from the Thames Valley Environmental Records Centre (TVERC) and the data on open space, ancient woodland, TPOs, LWSs, NRs and

BOAs has come from the Council's GIS database (this is updated when necessary and the information in the preferred options would show the position at February 2014).

Information on Local Wildlife Sites is included in the assessment. It is unclear whether the Berkshire Local Nature Partnership is referring here to a particular site.

Natural England comments are noted. The Background Paper explained the site selection process, the alternative sites considered were included in the SHLAA, the shortlisted sites were shown in Appendix 3 of the Preferred Options document and the SA/SEA provides evidence and reasoning to support the recommendations on which sites to allocate.

The Council held a duty to co-operate meeting with Natural England (NE) on 28 April 2015 in order to discuss the issues raised in its response. At the meeting NE made clear that it wanted to refocus the original comments (as set out above) made as part of the Preferred Options consultation and that in going forward, the Council should use the comments made in the 28 April meeting to represent the views of NE. The main issues discussed were -

- *River Kennet SSSI and River Lambourn SSSI/SAC - abstraction and discharge issues*

NE is content if these issues have already been covered by the Core Strategy HRA, but if not, the HSA HRA needs to be clear on both matters. NE stated that Thames Water and the Environment Agency need to confirm whether sites can be delivered within existing abstraction/discharge licences. (Thames Water has since confirmed that the sites can be delivered within existing abstraction/discharge licenses.)

- *Living Landscape Project*

NE acknowledged the importance of taking such a strategic led approach and made particular reference to the value of seeking contributions from individual developments as part of this. NE stated that it would fully support WBC in requesting contributions through individual site policies. It was agreed that the Council would reflect this approach in the proposed submission DPD.

- *Approach to sites in the AONB*

NE commented that development in the AONB would need to meet the major development tests if it had not already been considered through the Core Strategy. The Council confirmed that the spatial distribution had already been agreed in the Core Strategy and that the HSA DPD was being taken forward in accordance with policy ADPP5 which makes clear how development will be accommodated across the AONB. The Council also outlined the Landscape Sensitivity Assessment work already undertaken and further work which is

ongoing as part of that process. It was agreed that the Council would continue to take forward site specific policies in accordance with policy ADPP5.

- *Other comments*

NE noted that good design at the project stage will cover off most of its other comments raised in the original letter. It was agreed that the policies for individual sites will need to be bespoke and add value. NE commented that in some instances the loss of GI would be inevitable and asked how would compensation occur for these sites, ensuring connectivity is maintained. The Council confirmed that issues such as this would be taken forward in accordance with Core Strategy policy CS18 and through the site specific policies themselves. More detailed work would be undertaken through the production of LVIA as well at the planning application stage.

Support for site selection process noted.

The comments made by technical consultees have been included in the site selection summaries. Additional comments from some technical consultees have been submitted as part of the preferred options consultation and are available on the Local Plan Consultation Portal.

4. Settlement Boundary Reviews

Responses received: 6

Consultation Comments

- Protecting character and preventing unrestrictive growth are negated by redrawing settlement boundaries. What price localism when boundary can be redrawn at stroke of a bureaucrat's pen?
- Hope for decision to protect existing boundaries – otherwise risk of separate and individual communities being merged into one large conurbation
- Review only includes settlements within settlement hierarchy. The DPD is excluding suitable rural settlements form further modest growth which would help sustain and support local village services. Contrary to national guidance.
- Descriptions of how the review of settlement boundaries will be undertaken are somewhat vague and open to wide interpretation. The revision of boundaries needs to be precise and not open to last minute changes.
- Boundaries should be tightly drawn and only around approved sites/areas for development.
- In Mortimer review of settlement boundary should be left to NDP.

- English Heritage would expect to see landscape setting and historic environment as criteria for review but understand that revisions are largely to include allocated sites and sites below the threshold for allocation and have commented separately.

Council response:

The revisions to settlement boundaries are carried out through the DPD process, not at the whim of the local authority. The process is informed by evidence, SA/SEA and consultation and tested through the Local Plan Examination.

This DPD is focussing on the development potential of the settlements within the settlement hierarchy to meet the requirement set out in the Core Strategy. There may be potential for limited development within the settlement boundaries of the smaller villages but the Council is not considering allocations at these settlements. The new Local Plan will include a review of settlement boundaries throughout the District.

The revised settlement boundaries will be drawn around the developable areas of sites and shown on the Local Plan Policies Map. Once the plan has been examined and adopted these boundaries will form part of the development plan and will not be subject to change other than through the DPD process.

The revisions to settlement boundaries proposed will be relatively modest and will not lead to merging of any separate settlements.

The settlement boundary at Mortimer will be defined in the Mortimer NDP

Responses to English Heritage comments on individual sites are covered in the appropriate sections of this document.

5. Parking Standards for Residential Developments

Responses received: 2

Consultation comments

- Residents often pave over front garden, adding to run-off and degrading the area visually. Are any attempts made to prevent this?
- Issue is not so much provision of adequate parking but one of access and volume – no study/account has taken account on the impact of additional vehicles

Council response

Increased provision of parking spaces in new developments may discourage some from creating additional parking by paving over front gardens.

The transport assessments have considered the impact of the proposed allocations on the road network

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - Settlement Boundary Review Criteria

Responses received: 31

1. Comments on Criteria

Consultation comments:

- Proposed criteria are vague
- 8.1 – could be interpreted as rejected but potentially developable sites could be included
- 8.1 states the sites identified as suitable to include in the re-drawn boundary on the basis on which the suitability of these sites for inclusion is unclear, and the effect has not been subject to consultation or Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA), eg. CHI017 has already been found by a Planning Inspector to adversely affect the character and appearance of the surrounding area, but has been suggested to be included within the settlement boundary.
- 8.2 – could be almost any physical feature – eg. Stream, field boundary, footpath – this could result in areas not put forward for development, or rejected sites being included the settlement boundary
- 8.3 – implies the criteria may be changed or applied in defining settlement boundaries in the publication version, making the process obscure and not open to challenge by the public, opening the process to challenge by developers.
- Understand boundaries will be tightly drawn around the preferred sites, and ask that this is reflected in the document
- The criteria differ significantly from the existing criteria (West Berkshire District Local Plan 1991-2007 Saved Policies 2007) but the consultation includes no reference to these changes. These original criteria underpin the existing settlement boundaries are not being carried forward in the proposed boundary review criteria
- Can only assume that areas on or near the edge have not been included in existing settlement boundaries as a result of the above criteria but might be included in the revised settlement boundaries if the proposed criteria are applied
- In the absence of any analysis, one can assume that the areas to be classified differently under the review criteria are significant and extensive.
- The proposed criteria are unsound because they are an important and significant part of the preferred options that will have significant effects on natural features which would be detrimental to the character of these rural areas and many important features in the AONB
- The likely impacts are absent from the SA/SEA – this is a significant procedural omission and should be addressed before progressing to the next stage
- The criteria will only be applied to those settlements within the settlement hierarchy. There is no reference to how the proposed criteria will apply to settlements outside the hierarchy. This is perverse, as it would appear that two sets of criteria would be being used, the new criteria for the settlement hierarchy

and the saved policies version of settlements outside the hierarchy. There is no justification for the removal of the existing settlement boundary criteria only for settlements within the hierarchy.

- Seems more likely that the review criteria will be applied to all settlements in the district. The effects of this have been omitted from the SA/SEA.
- Statements suggest boundaries could be drawn around developable sites even if rejected at this stage, which is different from 4.12
- The DPD should be definitive as to the redrawing of boundaries tightly and around only approved sites/areas for development
- Mortimer Neighbourhood Development Plan (NDP) should redraw their own settlement boundary
- The settlement boundary consultation process should not significantly alter the present boundaries.
- Great care need is needed to ensure rural, market town of Newbury and its environs are not fundamentally altered or sites put under undue pressure.
- Redrawn boundaries should not encourage development creep and protracted developer planning submissions
- Consideration should be given to past recommendations of parish councils and other bodies/local interest groups views
- The review criteria only focusing on the settlement hierarchy is not consistent with national policy because it excludes many smaller service villages in the district which are nevertheless valuable, sustainable rural settlements.
- Village boundaries should follow clearly defined features
- A defined boundary between settlement and surrounding countryside can be established and still allow for future growth with encroachment of green spaces/farmland
- The strong existing landscape features (hedgerows, rights of way, field boundary, existing service network) seem a logical path to follow
- Many of the proposed 'developable areas' are smaller than the whole site – what control will there be on future development within those areas? It could mean it is impossible to prevent unrestricted growth and protect the character of the settlement
- The current criteria includes the words the "Settlement Boundary should only enclose the main settlement area", the new one does not.
- The current criteria include the words "open undeveloped parcels of land on the edges of settlements should normally be excluded", the new proposal says that small sites should be considered.
- There is no justification to change the criteria

Council response:

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991-2007. The DPD provides the opportunity to review the settlement boundaries of settlements within the Core Strategy's settlement hierarchy only as this is where allocations are being made. This will be made clear within the criteria. However, it is likely that the same criteria will be used in the new Local Plan (to be developed following the Housing Site Allocations DPD) to review the settlement boundaries across the district.

A review of the criteria is necessary to ensure that they are up to date, fit for purpose and consistent with national policy. The reviewed criteria are based on the criteria used within the West Berkshire District Local Plan 1991-2007. The final revised criteria will provide more guidance on the defining of settlement boundaries than those included in the Local Plan.

Early consultation on the proposed criteria allows for comments to be made as to the criteria themselves and their use. As a result of consultation changes have been made to the criteria to include more detail in relation to the bullet points. The updated criteria will be subject to further consultation as part of the proposed submission version of the DPD.

Changes to the settlement boundaries will only be made in accordance with the criteria. Changes can both increase the size of the settlement boundary, and reduce it. Details of the proposed revised settlement boundaries are included within the proposed submission DPD and shown on the proposals map and inset maps.

The revised settlement boundary redefines the 'settlement' area within which there is a presumption in favour of development, and protects those areas outside the new boundary from development.

The criteria are not policy and therefore, do not need to be subject to Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Any development coming forward on a site, included within the revised settlement boundary would be subject to planning permission being granted. While there is a presumption in favour of development for sites within the settlement boundary, this does not mean that planning permission would be granted for an unsuitable development.

The Core Strategy states that development will be focused in the settlements within the settlement hierarchy. The Housing Site Allocations DPD only allocates sites for development adjacent to the settlements within the settlement hierarchy; therefore, at this stage it is appropriate to only consider the settlement boundaries of the settlements within the settlement hierarchy. All remaining settlement boundaries will be reviewed as part of the new Local Plan, to be produced following the Housing Site Allocations DPD.

Mortimer Neighbourhood Development Plan will be allocating its own site/s for development and will review its own settlement boundary.

Previous comments and requests relating to settlement boundaries have been taken into account.

Criteria:

The revised settlement boundaries have only been redrawn around the developable area of sites allocated for development, not the site boundary as promoted. Not all sites set out in the preferred options DPD have been allocated, and the rejected sites will remain outside the settlement boundary.

In some areas small sites, which are not proposed for allocation have been included within the settlement boundary. Where sites are proposed for less than five dwellings these are not considered suitable for allocation, but do have some potential for development. Therefore, these sites have been included within the settlement boundary. Where this is the case, these sites have been assessed and the assessment details are included within the SA/SEA.

Changes have been made to the criteria to take into account comments made. "Settlement Boundary should only enclose the main settlement area" and "open undeveloped parcels of land on the edge of settlements..." are now included.

2. Specific Settlement Boundary Change Requests

Newbury

Newbury College (8710)

Consultation comments:

- The college site is situated beyond the historically defined, now out of date, settlement boundary
- The site is bounded by the Sandleford Park strategic allocation to the east, south and west and by proposed residential development to the north
- The college is seeking an extension to the settlement boundary to include the college campus
- Inclusion within the boundary would constitute a natural rounding off to the settlement
- The site is highly sustainable and accessible location, contained on four sides by existing or proposed development
- Extending the settlement boundary to encompass the College Campus, should show regard to the allocation at Sandleford Park
- The boundary should encompass land within the College's control, including land to the south which benefits from extant planning permission for a conference/training facility
- Failure to include the College would result in a contrived and illogical settlement boundary which fails to take account of the appropriate context.

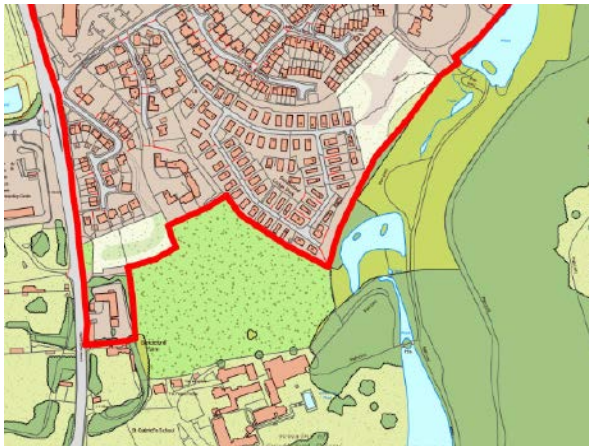
Council response:

Comments noted. It is proposed to include the College Site within the settlement boundary, in line with the developable area of Sandleford Park. The whole of the College's land holding is not considered appropriate for inclusion within the settlement boundary as it does not meet the settlement boundary review criteria.

NEW058 (Land to the east of Sandelford Lodge Mobile Home Park) and NEW059 (Land to the south of Deadmans Lane):

Consultation comments:

- With regard to the review criteria and in light of a review being carried out of the extent to which development can take place without adversely affecting the significance of heritage assets it is proposed that this site and NEW059 should be incorporated in the settlement boundary to allow for small scale rounding off. This would complete the pattern of settlement and provide a coherent and logical urban edge to the existing area



Council response:

Both NEW058 and NEW059 are within Historic England's Historic Park and Garden designation. This area of the Historic Park and Garden is on the "Heritage at Risk" Register; therefore, development on the site would not be appropriate and would receive an objection from Historic England that could not be overcome.

NEW212A

Consultation comments:

- Consideration should be given to potential development sites immediately north of Newbury (at Donnington) to consider the benefits and impact of a smaller scale of development in keeping with the scale and form of the village.
- This site could be considered as a small site suitable for development, but below the threshold for allocation
- The site is 1.3ha, immediately adjacent to the built up edge of Donnington
- It is currently used as an informal overflow car park serving the Gold Club
- There are no specific on-site policy constraints
- It would provide a sensitive residential scheme with a range of housing, creating a logical extension to the existing built form to the south
- Buffer planting would screen dwellings, minimising the visual impact and helping to retain the green and leafy gateway into Donnington/Newbury



Council response

The site is not adjacent to the Newbury settlement boundary; rather it is adjacent to the Donnington Settlement Boundary. At this stage the Council is only looking to review the settlement boundaries around settlements within the settlement hierarchy. Donnington is not within the settlement hierarchy.

The site does not meet the settlement boundary review criteria, and therefore, cannot be included within the settlement boundary at this stage.

Thatcham

THA009: Land at Tull Way/Henwick Lane

Consultation comments:

- Would object if the site was to be removed from the settlement boundary as this would be a failure to acknowledge the site's potential to deliver sustainable residential development and would alter a logical and long standing boundary to the boundary of Thatcham

Council response:

Comments noted. There are no plans to remove the site from the settlement boundary.

Eastern Urban Area

Consultation comments:

- Tilehurst Parish Council will object to any changes to the settlement boundary
- Many trees could be lost if the boundary is moved, and local wooded areas put at risk
- The boundary also protects the AONB from intrusive development.

- The land between Holybrook and Theale was designed as an important open space creating spatial distinctions between the two parishes. Infilling of this area would destroy this.
- Any improvements required to J12 will be inhibited by housing development to the west of the junction

Council response:

Comments noted. The settlement boundaries will be altered to include any site allocated for development. No other changes to the settlement boundary are proposed. Development of the allocated sites, should not have any impact on existing trees and will result in additional landscaping, planting and public open space.

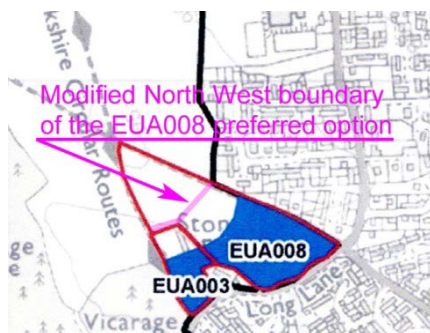
The Important Open Space designation no longer exists. The spaces between settlements are still seen as important and a landscape character approach is now taken to give more flexibility in allocating changes of use and development. It is essential that new development helps to sustain a strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in Core Strategy policy CS19.

Highways England has been consulted on the preferred options sites and have not raised any concerns in principle regarding development of the sites close to junction 12 of the M4.

EUA008: Stonehams Farm

Consultation comments:

- Make the preferred North West boundary of the site from the Conifer Drive Settlement boundary across to the north west boundary of EUA003. This would make a well-defined demarcation boundary to further outward development



Council Response

Comments noted. The settlement boundary will be revised to include the developable area of the sites allocated for development. These sites are proposed for allocation.

EUA035: 72 Purley Rise

Comments from the site promoter:

- If the site is to be allocated the settlement boundary should be re-drawn to reflect the allocation
- If not allocated, there is still good reason to review the settlement boundary.
 - The current boundary takes an unexpected kick in behind numbers 70 and 72a Purley Rise
 - No 70 is the oldest house on the road, yet its garden is excluded from the settlement boundary, when the gardens of houses built decades later are within the settlement boundary
 - The workshop building northwest of No 72a has been in existence for decades and used for commercial purposes for 40+ years.



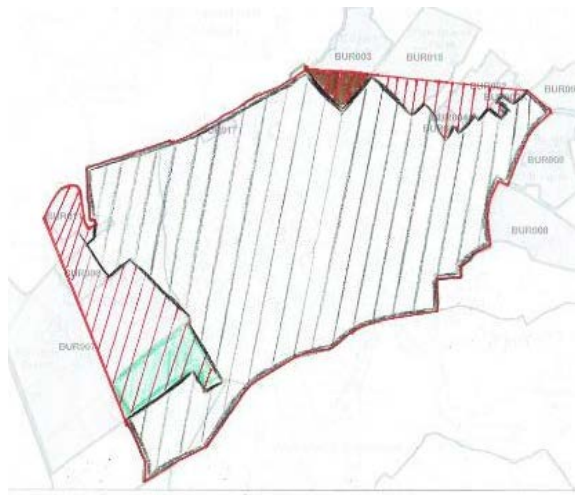
Council response:

Comments noted. The settlement boundary will be revised to include the developable area of the sites allocated for development. This site is proposed for allocation.

Burghfield Common

Consultation comments:

- The new boundary appears not to have a natural boundary rounding off. The rejected sites would form a better boundary to Burghfield Common
- The proposed boundary does not appear to have any defining line of an actual "settlement boundary"



Council response:

Comments noted. The settlement boundary will be revised to include the developable area of the sites allocated for development. The settlement boundary defines the main settlement area, including where sites are allocated. The process of site selection includes an assessment of sites according to their suitability and as a result of public consultation, not as a result of them forming a better boundary to a settlement.

Hungerford

HUN021: Five Bar and Grill/The Lamb

Consultation comments:

- The adjoining landowner, Town and Manor object to redrawing the settlement boundary at this site
- The wording used in the DPD is misleading – the former pub and outbuildings have been converted into dwellings and area already within the settlement boundary, as are two cottages recently constructed on the former car park
- This means the site potential is for 2 additional dwellings, not 7 as stated in the SHLAA
- The proposed change is solely intended to enclose the site known as the Meadow, which has been deemed not developable by ABC planning department
- The Meadow site was subject to a failed planning application for 2 cottages in April 2014 (ref: 13/03164/OUTD). Reasons for refusal included – not sustainable development, impact on conservation area, contrary to Core Strategy and Local Plan, impact on AONB
- Redrawing the settlement boundary is contrary to the review criteria stated in the DPD which permits a boundary change for small sites submitted through the Strategic Housing Land Availability Assessment (SHLAA) considered suitable for development, but below the threshold for allocation – the Council has declared this site to be unsuitable for development, therefore it would be unsound to redraw the settlement boundary around it

- Request removal from DPD
- Potential impact on the sensitive environment of the adjacent river

Council response:

The preferred options DPD indicated that the site would be included within the settlement boundary.

Planning Application 13/03164/OUTD, was allowed on appeal, and the site is proposed for inclusion within the settlement boundary.

HUN002: Land at The Paddock, Marsh Lane

Consultation comments:

- The site is defined by obvious physical features (northern boundary – Marsh Lane, eastern boundary – Bel Air, southern boundary – railway, western boundary – Marsh Gate development)
- Part of the site is already developed, with a house permitted in 1996 and horse-related structures on the site
- The review criteria do not require any new land included in an extension of the settlement boundary and should satisfy criteria relating to conserving the AONB, having adequate vehicular access etc. As this is not relevant – therefore, objections raised in the SHLAA assessment relating to access and landscape are not relevant to this submission for inclusion in the settlement boundary
- Adequate vehicular access can be provided, the issue was address in relation to a planning application in 2004 for 6 houses (04/01429) – refused on ground of No S106 which would have enabled highway improvements to Marsh Lane to be provided. Details on this were contained in the 2013 submission to the Council
- The 2009 Landscape Assessment concludes that the site is perceived to merge with the town in landscape terms and is considered to be clearly distinct from the more sensitive landscape areas beyond

Council response:

The site does not meet the settlement Boundary review criteria and therefore, cannot be included within the settlement boundary.

Bradfield Southend

BRS002: Corner of Cock Lane and South End Road

Consultation comments:

- The current settlement boundary goes around the site on three sites. The fourth side is separated from adjoining countryside by a thick tree belt, so if development was to take place on this land it would not have an adverse impact and would form a logical infill site within the current settlement pattern. It is requested that the site is included within the boundary.



Council response:

The site is too small for allocation, but is considered suitable for limited development and therefore, will be included within the settlement boundary.

Chieveley

Consultation comments:

- Green Lane is outside the existing boundary for good reason, as it is a separate place – Horsemoor has existed as a separate entity from Chieveley for hundreds of years
- It was considered for a conservation area, however it was not thought necessary since it was outside the settlement boundary
- New development in the area will have a profound effect on Horsemoor and there appears to be no good reason to change the boundary
- Any change would be a definite loosening which would affect Green Lane

Council response:

Comments noted. However, Green Lane does form part of Chieveley and meets the settlement boundary criteria; therefore, it is proposed that it is included within the settlement boundary. Any development in the area would need to be in keeping with the surrounding area.

The conservation area could be reviewed as a result of the settlement boundary change.

CHI001: The Colt House, Green Lane

Consultation comments:

- The staggered nature of development on Green Lane differentiates it from the close-knit physical character of the main settlement and this distinction would be lost if development of this site took place
- Development of this site would alter the character of Green Lane, which is considered to be rural, enjoying large green spaces

- Redrawing the settlement boundary to include this site would require an area outside the settlement boundary to the north to be brought within the boundary, this supports the view that this site is not part of the main settlement
- This site should not be included within the settlement boundary
- The SA/SEA for this site states that development would be out of keeping with the character of the area, therefore the site should be rejected.

Council response:

Green Lane itself meets the settlement boundary review criteria, forming part of the main settlement of Chieveley. Core Strategy policy CS14 sets out the Council's design principles, which require high quality and sustainable design that respects and enhances the character and appearance of the area. Any development in this area would need to comply with this policy.

CHI017: The Old Stables, Green Lane

Consultation comments:

- The staggered nature of development on Green Lane differentiates it from the close-knit physical character of the main settlement and this distinction would be lost if development of this site took place
- Development of this site would alter the character of Green Lane, which is considered to be rural, enjoying large green spaces
- Redrawing the settlement boundary to include this site would require an area outside the settlement boundary to the north to be brought within the boundary, this supports the view that this site is not part of the main settlement
- This site should not be included within the settlement boundary
- The SA/SEA for this site states that development would be out of keeping with the character of the area, therefore the site should be rejected.

Comments from the site promoter

- Extending the settlement boundary to include the Old Stables would be consistent with the criteria set out in section 8
- The site is very much read within the built up area of the village
- The site is contained by residential cartilages on each site, therefore, development would not result in encroachment into open countryside
- The site could be developed for a modest residential scheme representing appropriate and sustainable growth, conserving the landscape qualities of the AONB
- The site is outside the Conservation Area and away from listed buildings
- Appropriate vehicular access can be established onto Green Lane
- Previous planning application 12/00025/FUL showed that appropriate vehicle access could be achieved.

Council response:

Green Lane itself meets the settlement boundary review criteria, forming part of the main settlement of Chieveley. Core Strategy policy CS14 sets out the Council's design principles, which require high quality and sustainable design that respects and enhances the character and appearance of the area. Any development in this area would need to comply with this policy.

Comments from site promoter noted.

CHI016: Land at Morphetts Lane, Downend

Consultation comments:

- The site satisfies the criteria
 - The site adjoins other village properties on all but its northern boundary, it feels part of the settlement
 - The northern site boundary forms a strong visual boundary to this end of the village
 - There is a right of way adjacent to the site which could accommodate the settlement boundary
 - The site is below the threshold for allocation (the only reason the site was excluded)
 - It is well related to all village services and amenities

Council response:

Comments noted. The site is proposed for inclusion within the settlement boundary as it meets the settlement boundary review criteria.

Lambourn

Consultation comments:

- Existing brownfield land has not been included in the settlement boundary.
- Land which lies to the south east of Southbank and which extends to Long Hedge on the NE site of Newbury Road should be included in the settlement boundary
- As should the area known as Francomes field and a parcel of land to the NE of Lambourn Racehorse Transport which includes Delamere Stables
- Land to the NE of the village adjoining existing housing and west of Wantage Road is preferable compared to LAM007

Council response:

Suitable brownfield land that the Council are aware of has been taken into account.

The land between Southbank and Long Hedge is proposed for inclusion within the settlement boundary. A new site was submitted as part of the preferred options in this area, which is proposed for allocation, and therefore, links the development at Southbank with the development up to Long Hedge.

Inclusion of the area near to Delamere Stables is not considered to meet the settlement boundary review criteria and development of Delamere Stables itself would be contrary to policy CS12 of the Core Strategy.

Development to the NE of Lambourn is not considered appropriate. Landscape Assessment work in this area (LAM006) indicates that development would cause harm to the AONB and therefore, it is not considered acceptable.

Beenham

SHLAA reference RUR265

Consultation comments:

The site adjoins the settlement boundary and continues to be available for development. Support the proposal to review the settlement boundary in order to accommodate sites that are considered to be suitable for development

East Garston

Consultation comments:

- East Garston is sustainable and should be considered for a settlement boundary review and extension to allow additional modest housing growth to support the vitality and viability of existing services in the village
- National Planning Policy Guidance (NPPG) supports growth to villages to address local housing needs. Complete exclusion from any growth is an unsustainable strategy and not consistent with national policy

SHLAA reference RUR203

Consultation comments:

- The site comprises open pasture and is bounded by Roger's Lane to the north, marking the edge of the settlement, Hillside road to the south and modern housing to the east. It is contained by a developed edge on all sides and contained by clearly defined physical features, representing a logical and sustainable extension to the village.
- Rural housing is essential to ensure the viability of local facilities (schools, shops, cultural venues, pubs, places of worship)
- The DPD does not positively seek opportunities to meet local development needs

Council response:

Neither Beenham or East Garston are within the settlement hierarchy, and therefore, settlement boundaries reviews are not taking place for these settlements as part of the Housing Site Allocations DPD. Review of these settlements will take place as part of the Local Plan.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Sites for Gypsies, Travellers and Travelling Showpeople – General Comments

Total responses received: 6

Inadmissible responses: 1

Total processed responses: 5

Consultation comments:

- Support decision to reject site at Benham's Farm, Burghfield (site GTTS3) as a preferred option for a traveller site.
- Concentrated provision of traveller sites – all in EKV with no provision elsewhere in the District. Disproportionate.
- Stated need in document is 14 pitches but the preferred options total 18 pitches.
- Concentration of sites within 6km of Mortimer (East Kennet Valley) and there is none in the rest of the District. This is not reasonable – for the travellers or for the local settled community as it places additional strain on the infrastructure.
- New sites should be provided in other spatial areas – evenly distributed.

Council response:

Comments noted.

The stated need within the DPD is that from preliminary findings of a draft GTAA study (Gypsy and Traveller Accommodation Assessment). This has now been finalised at 17 permanent pitches.

The Council carried out a Call for Sites exercise seeking potential traveller sites from landowners and developers across the whole District. The Council considered those submitted and the sites along with the assessments are set out as part of the DPD and supporting documentation.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Sites for Gypsies, Travellers and Travelling Showpeople – GTTS2: Circus Headquarters, Long Copse Farm, Enborne (Travelling Showpeople)

Responses received: 69

Consultation comments:

1. General

- Object and contest that Long Copse Farm is outside of an existing settlement. Dispute planning judgements that Enborne is not a true settlement socially, geographically, historically and rural/agricultural in nature.
- The site has a poor history of planning compliance and enforcement action has been weak.
- It needs to be made clear how the past planning approval on the site relates to the potential allocation/DPD.
- Recent aerial photography shows 20 caravans/trailers and other vehicles parked on site, contravening existing planning permission. It is reasonable to assume that the number of caravans will far exceed the permitted number, creating even more problems.
- Object to a permanent site for Travelling Showpeople. The allocation should be time limited and address exit routes so that the site is reinstated to agricultural use should the Showpeople leave.
- The allocation should be limited to Travelling showpeople only and not allow wider Gypsies and Travellers, or residential use on the site in the future.
- The allocation should be not made on the basis that the agricultural element is not sustainable due to its size.
- There is no indication of the average occupancy and what this might be at any time. The number of extra caravans is unclear, and whether the site would be for 'winter quarters' or 'all year' occupancy.
- The site is not on Vanners Lane, but on Wheatlands Lane.
- The landowner of the site has permission to land RAF helicopters on this land at night – will this permission be withdrawn if 24 more plots are allowed?
- Residents in Enborne have not been approached by the Council regarding the plans but found out via the local newspaper.
- Timing of consultation was at a time when most people were away on holidays.
- Additional caravans/vehicles will be highly unsightly and polluting.
- It is noted that at a meeting in Beech Hill the Head of Planning said, 'Legislation states that we cannot extend to the point where a site is dominating the existing

settled community'. This proposed allocation would dominate the local population.

- This sort of development is suitable for an already urban or industrial area, not in the countryside where people come to enjoy the peace and quiet.
- West Berkshire DC has refused planning requests to provide equestrian facilities locally because of the resulting danger from the increase in heavy traffic on local lanes – should apply the same logic to the consideration of this site.

2. Infrastructure

- Assessment on potential CIL/S106 expectations has not been addressed in terms of the DPD allocation for occupiers and landowner – funding of social infrastructure.
- The site will not be deliverable in terms of infrastructure – no drainage, power, mains sewerage or lighting.
- The local school does not have capacity. It is turning pupils away and cannot expand.
- Concern that the Travelling Showpeople will not have the social support/infrastructure – the allocation will increase the number of 'homes' in the Parish by around 8% (existing homes are c250 units in the Parish).
- Before granting further development the facilities for education, health and social support needed by the existing and the travelling community must be put in place.
- Facilities and services are some distance from the site.
- Doctor's surgeries are full.
- The proposal adds further pressure on the infrastructure in a rural area/outside of settlement boundary.
- Most local residents use septic tank drainage and there is no gas supply to the area.

3. Site boundary

- The site boundary for the allocation is huge.
- The actual size of the site required is 4.4 ha – this needs to be clearly set out, with the remainder of the site kept for agricultural.
- One of the Berkshire Circular Routes crosses the northern part of the site, adjacent to a small wood and within the AONB. Concern that a more intensive use on the site would discourage walkers from using the footpath, which serves as an important link to the countryside. Footpath and adjoining wood should be excluded from the development site and additional landscaping and appropriate fencing be incorporated within the site to protect the amenity of the footpath.
- Over development of a rural area.

- Development of the site would dominate the dispersed nature of surrounding development.

4. Environmental

- Environmental analysis and impact looks poor and inappropriate – recognises problems but provides no solutions.
- A very strong flood light stands out against the dark night skies – this has a detrimental impact on the environment.
- The site is wet agricultural land, prone to flooding – development will increase run-off and risk of flooding.
- Lack of mains drainage and sewerage will be an environmental risk.
- The existing site does nothing to enhance the quality of this one time agricultural land, enlarging the site can only harm the area.
- The site is agricultural land very close to the North Wessex Downs AONB and even closer to Redhill Woods SSSI – should not be built or concreted over.

5. Core Strategy policy CS7

- The allocation of this site does not comply with policy CS7.
- Ensure the policy CS7 is followed and identify a more suitable site.
- Fails to take account of the impact on the settled community and dispersed settled geography of Enborne.
- The site is not close to amenities – shops, doctors etc.
- There is no bus route to services and/or facilities.
- Correct SA/SEA pg87/88 and Appendix 10 – there has never been a bus stop in or near Vanners Lane.
- Vanners Lane is mentioned within Appendix 10 twice, but Vanners Lane would not be directly affected unless the caravans/lorries were rerouted.
- It states that nearest active bus route is 1 km away, but fails to mention that it is not accessible in terms of safety, distance for elderly, small children etc. The nearest bus stop is not 1 km away, but 2km away. Realistically every visit from the site will be by private vehicle or taxi.
- Shops and a surgery are within 2km away but cannot be accessed by public transport from the site.
- Site is within Flood Zones 2 and 3 and has a stream along the western and northern boundaries.
- Enborne area was much affected by flooding in early 2014.
- The proposal will have a harmful impact on the adjoining settled communities.
- Mixed use on the site would be inappropriate in rural setting, compounded by lack of public transport.

- The site is already at odds with the surrounding well managed farmland, and enlarging the site and adding business activities will compound the problem.

6. Highways

- Surrounding roads are narrow and totally unsuitable for large vehicles.
- Local lanes are inadequate for any increase in the number of large vehicles.
- Recent fatality highlights unsuitability of local roads.
- No mention is made within the DPD as to how these ancillary vehicles will be stored.
- A large number of articulated HGVs use Wheatlands Lane on a regular basis and this has safety implications for the primary school, horse riders, walkers and cyclists.
- The site has poor access and has no walkway access that would be safe along the lane.
- Safety concerns due to the narrow width of Wheatlands Lane, blind corners, lack of footpaths and lack of street lighting.
- No easy access to the A34.
- What is the recommended route for lorries to access the A34 as there is no easy route? All local roads are narrow/tracks.
- The increase in vehicle movements could be substantial.
- HGVs cannot pass on the local roads/lanes.

7. Landowners letter

- Quote taken from landowners letter (circulated to local residents):
'Earlier this year I agreed in principle with West Berkshire Councils request to submit a proposal for Circus Showman's Yards on my property but I was very clear that I would NOT accommodate Travellers. The final figure of 24 Circus Showmen's Yards came from the Council, not myself, again, presumably to meet guidelines'

Clarification sought on the above quote, to explain why the DPD shows that the site would be for Travellers and Gypsies when this is not what was agreed with the landowner.

- Why have West Berkshire Council not been transparent in their consultation documents regarding who would be able to take up residency under their suggested proposal?
- Why did the Council not copy all local residents into the original consultation letter? A lack of communication has forced the local residents to send circular letters.

- The landowner mentions that the Council deemed the road infrastructure to be suitable in 2001 – surely this needs looked at again given the large increase in vehicles.
- The landowner claims that large vehicles do not use Wheatlands Lane, but given the property is accessed off Wheatlands Lane how is this possible?
- The Council need to be more transparent in their attempts to satisfy Government demands.

Council response

The consultation process undertaken, process of site identification and justification and relationship with Core Strategy Policy CS7.

Potential sites for accommodating gypsies, travellers and travelling showpeople, including Long Copse Farm were identified following a ‘call for sites’ undertaken during April/May 2014, with the aim of identifying land to meet the Council’s requirement to accommodate Gypsies and Travellers and Travelling Showpeople. Landowners and developers were contacted and invited to submit sites available to meet these needs. Five sites were submitted during this process, including Long Copse Farm. The site that was suggested could accommodate an additional 20 plots on an area around 4.4Ha for Travelling Showpeople. In addition, the Council considered a further 5 sites including a site in unauthorised use, a site submitted in the Strategic Housing Land Availability Assessment , one with lapsed planning permission and two in council ownership. Therefore, in total 10 sites were identified.

Each site was assessed for its suitability for this use against the criteria set out in Core Strategy Policy CS7, together with any known constraints and with regard to guidance set out in the National Planning Policy Framework and Planning Policy for Traveller Sites. A Sustainability Appraisal and Strategic Environmental Assessment was undertaken to assist in assessing the sustainability of each of the sites for development. These site assessments form Appendix 10 of the Sustainability Appraisal (SA).

Public consultation on the sites was undertaken between 25th July and 12 September 2014. This process was widely advertised and a letter sent to each parish council and to homeowners of properties within 100m of the sites.

There is still work to be done to refine the detail of any allocation, including the land area required to accommodate the additional plots, where on the site any additional plots would be best located and a potential layout. This work is currently ongoing.

Needs Assessment for Gypsies, Travellers and Travelling Showpeople.

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

The Council commissioned Opinion Research Services to undertake a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). This study will be published alongside the DPD and sets out the level of need which is required within West Berkshire in the period between 2014 and 2029. Overall the study identifies a requirement for 17 permanent pitches for gypsies and travellers and 24 plots for travelling showpeople. The sites identified in the preferred options consultation would meet the identified level of need.

Education issue.

Due to the nature of the work of potential occupants, for the majority of the year, they would be travelling rather than living at the site. Therefore, attendance at the local school would be temporary for a few months of the year. In these circumstances, we are advised that normal admission rules do not apply and that children from the site would be able to attend the local school.

Sustainable location issue.

The Sustainability Appraisal does not identify significant negative impacts on environmental, social or economic factors but does identify a number of areas where mitigation will be required to offset the impact of the development. This includes, for example, the creation of a buffer between the development and the ancient woodland, local wildlife sites and the adjoining public right of way. The mitigation measures needed for the site will be set out in planning requirements for the development. No impact on Redhill Woods is expected as it is located more than 1km away from the proposed site.

National planning policy does seek to restrict Gypsy and Traveller sites being located in the open countryside. However, the site is already an existing one and the SA does not identify significant adverse sustainability impacts from the proposed development.

Access to facilities issue.

The nature of the proposed development means that occupants of the site will only be present when they are not travelling as part of the circus. This is likely to be for relatively short periods during the year, not necessarily during the winter season. This temporary occupancy during the year needs to be balanced against access to

facilities. Whilst the site is outside of a settlement boundary, facilities are located close by and the use of the site will be concentrated into short periods of the year.

The planning process and planning requirements for the development of the site

Allocating Long Copse farm in the Housing Site Allocations Plan (HSA) does not mean that the normal planning application process would not be required. As part of the allocation, a number of planning requirements will be set out and will need to be addressed as part of any planning application made for the development of the site. This will include for example, the need for additional landscaping/fencing, the location of the plots, lighting and service provision. These would be included as conditions of any planning permission and some may be required to be implemented before any development occurs. The Council has enforcement powers if any conditions are not complied with.

Nature of the site allocation.

The proposal in the HSA Plan is for the purpose of accommodating Travelling Showpeople only. This will be stated in the site allocation requirements. Currently, the site includes areas within Flood Zones 2 and 3 and areas close to sensitive wildlife areas. It is proposed to refine the site boundary to omit the area within the flood zones and to more closely reflect the land area required to accommodate the number of plots in the allocation.

The current planning position on Long Copse farm.

Enforcement issues have arisen on the site associated with the number of vehicles and the erection of the circus tent. These issues are being investigated and action will be taken if required.

Scale of the proposed site and appropriateness in a rural location.

National policy contained in the Planning Policy for Traveller Sites , March 2012, para 23 states that local planning authorities should strictly limit new traveller development in the open countryside and ensure that sites in rural areas respect the scale of and do not dominate the nearest settled community and avoid placing undue pressure on local infrastructure. Though the proposal for 24 plots over the next 5 years seems a sizeable increase over the current existing 4 plots, the resulting population is likely to be around 100 residents. Within Enborne parish, the latest population figure is 775 residents. This would therefore increase the local population by just under 14%. This scale of increase though significant could not be assessed as dominating the local population.

The issue of whether the proposal would dominate the rural area is harder to assess as this is affected by the design and layout of the proposed site as well as the additional landscaping required. The area of land required to accommodate 20 plots over the first 5 years of the plan is 3.8 hectares (4.56 ha for 24 plots over the full plan period). The Sustainability Appraisal indicates that sensitive design, layout and siting of the development and landscaping will be needed to mitigate the visual impact arising from the site. Given the scale of proposed development, in line with national policy, planning requirements will limit the part of the site to be used for business operations to limit noise and visual impact and limit the number of days the site can be occupied by more than the allowed number of caravans.

Site relationship with adjoining settlements

A correction needs to be made to the SA/SEA assessment to replace `outside of any existing settlement` to `outside any existing settlement boundary`.

Highway issues

The nature of a site accommodating travelling showpeople is that for the majority of the time there will be a very low level of large vehicle movements. However, the daily vehicle movements from residents accessing service and facilities is likely to require road widening and/or passing places eastwards from the site to accommodate the increase in vehicle numbers. These measures would be incorporated as planning requirements for the development of the site.

The SA/SEA should be corrected to omit the reference to `the nearest bus stop is located just outside the site along Vanners Lane – approximately 130m from the site, however, the nearest active bus stop with an active bus service is just over 1km away`.

Access to medical facilities

It is recognised that access to doctors' surgeries is currently under pressure at a national level, leading to increases in waiting times for appointments. Residents on the site would register with the nearest practice with space on their books.

Approach to site assessments for Traveller sites

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	<ul style="list-style-type: none"> Whether access is of, or can be made to, an appropriate standard, including consideration of

Policy CS7 Criteria	Key considerations
transport services	<p>its adequacy, the character, width, alignment and speed of the road</p> <ul style="list-style-type: none"> • 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 • 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

Policy CS7 Criteria	Key considerations
	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

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Sites for Gypsies, Travellers and Travelling Showpeople – GTTS5: New Stocks Farm, Paices Hill

Responses received: 10

1. General

Consultation comments:

- Ambiguous wording. The plan does not make clear that the proposal is to replace some of the 15 transit pitches already on the site, not for a net increase in pitches on the site. This should be made clear.
- Concerned that the DPD suggests a net increase in the number of pitches and this would therefore increase the number of people at risk on the site. Parish Council objects to any proposal which would increase the number of people beyond that already on the site.

Council response:

The wording of the site allocation will be clarified in the proposed submission version of the Plan and state that up to eight permanent pitches will replace 8 of the 15 transit pitches already on the site i.e. that they are not additional and the proposal will not to increase the overall number of pitches on the site.

2. AWE

Consultation comments:

- New Stocks Farm, Paices Hill (GTTS5) and Padworth Farm are within the AWE Aldermaston detailed emergency planning zones (DEPZ).
- Mobile homes/caravans do not provide significant protection against ionising radiation, or the ingress and subsequent inhalation of radioactive material.
- Adoption of GTTS5 as an allocation would place additional persons at risk of harm and therefore ONR advises against GTTS5 for traveller pitch provision.
- ONR would recommend sites for the travelling community are located outside the DEPZ around nuclear sites and that the distance from nuclear sites is taken into consideration when selecting such sites, with potential sites further from nuclear sites being preferred over those that are closer so far as is reasonably practicable to do so.

Council response:

The proposal is to replace 8 of the 15 transit pitches with 9 permanent pitches. No additional persons would therefore be at risk of harm. The wording in the Preferred Options Plan was ambiguous and discussion has subsequently taken place with ONR to clarify the position and they now have no comments on the proposal. It is proposed to amend the wording in the Plan to ensure that this is made clear.

3. Environment

Consultation comments:

- New Stocks Farm (GTTS5) is immediately adjacent to a nature reserve which is managed by the Trust.
- The reserve hosts a number of protected species.
- Existing travelling community has historically resulted in conflict with the management of the reserve and a deterioration of habitats.
- Should the site be allocated appropriate avoidance and mitigations measures will be required to ensure no adverse impact on the protected species (namely the killing and/or injuring of protected reptiles). In the absence of these measures the allocation would be unsound.
- Consideration of the impact on Pamber Forest and Silchester Common, as well as Pools and Woods and Decoy Pit SSSI's.
- Impact of increased recreational disturbance, utility provision and land take should be considered.
- Paices Wood is an important nature reserve and hosts a number of different species.
- Object to the proposal to allocate New Stocks Farm (GTTS5) on ecological sustainability grounds.
- West Berkshire is a beautiful place to live and has a large number of SSSIs, SACs and nature reserves – protect the diverse ecology of the District.
- Develop on sites which are not so close to ecologically important and sensitive sites/locations.

Council response:

The site is an existing gypsy and traveller site and the proposal does not increase the overall number of pitches. The site is 100m from the Country Park and Paices Wood and there is no direct connection. It is not therefore envisaged that there will be additional effects on the country park from the proposal and therefore no mitigation measures have been identified.

The Council's ecologist does not consider that there will be additional impact on Pamber Forest/Silchester Common/Pools and Woods and Decoy Pit SSSI's, with no direct access and being located on the other side of AWE. In a meeting with Natural England to follow up comments raised in the public consultation, they did not raise any concerns on the proposed development.

4. Foul drainage

- New Stocks Farm (GTTS5) is not close to a mains sewer connection.
- It is recommended that sites are put forward where it is feasible to connect to mains sewer to ensure no risk of pollution to controlled waters.
- Where this is not feasible a package treatment plant can be considered. Septic tanks should only be considered if it can be clearly demonstrated by the applicant that discharge into a public sewer to be treated at a public sewage treatment works or a package sewage treatment plant is not feasible.
- It is expected that foul drainage will be addressed in this DPD.
- It is strongly recommended that pollution to controlled waters from effluent is understood through the production of a foul drainage scheme. Without this the plan is unsound.

Council response:

The proposal is to replace existing transit pitches with 9 permanent ones. The existing transit site has planning permission for a toilet block and sewage tank but this has not yet been implemented. A planning requirement will be added to the site allocation seeking a foul drainage scheme to be submitted with a planning application and for prior discussions to be undertaken with Thames Water. The Environment Agency views will be sought on any submitted scheme.

5. Support for allocation

- Support allocation of New Stocks Farm (GTTS5) for a traveller site as it is an existing site and therefore will have less impact than developing a new site elsewhere.
- Local facilities in Tadley and surrounding area are sufficient.
- The proposal to allocate the site is fair given it is already an existing site.
- Support New Stocks Farm (GTTS5) as a preferred option as it has long been accepted as a site for the travelling community.

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Sites for Gypsies, Travellers and Travelling Showpeople – GTTS6B: Clappers Farm, corner of Bloomfield Hatch and Cross Lane

Total responses received: 70

Total inadmissible responses: 6

Total responses processed: 64

Consultation comments:

1. General

- Keep the site for farming.
- Current plans not suited for this area.
- The local planning authority has not taken into account the fair and equal treatment of travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community, as set out in national policy (Planning Policy for Traveller Sites, 2012 (PPTS)).
- The site is not sustainable economically, socially or environmentally.
- With regard to the rejected sites – Benhams Farm (GTTS3) is within close proximity of Burghfield and therefore close to services and facilities. Land behind Paices Hill (GTTS4) would provide an extension to an existing site. The rejection of Purley Rise for housing would directly conflict with national policy to ensure the fair and equal treatment of travellers. Therefore suitable alternatives are available and Clappers Farm should no longer be a preferred option.
- The proposal goes against West Berkshire policy to help young people into farming, as this site is currently used as a farm.
- Travellers never cease to fill the available sites, and the need for the above location has not been demonstrated.
- Beech Hill is not a development area, and Clappers Farm falls within Beech Hill.
- Concern for the potential for an increase in anti-social behaviour and fly-tipping, and the police's ability to control it. Based on my experience at a site in nearby Mere oak Lane.
- The site has no history of previous development and therefore its suitability for travellers is unknown, along with the environmental impact.
- Accumulation of waste by the occupiers of the site is a concern. This can be limited by restricting the use of the proposed site to residential use only, and banning commercial vehicles, plant and industrial equipment from the site and immediate surrounding area.

- Why do Gypsies and Travellers need a permanent site – I thought they wanted to travel? Why should they receive special treatment when local people cannot obtain economical houses?
- The site is unsuitable and will infringe on ability to farm adjoining land efficiently.
- Should the proposal go ahead and not be built until 2021 as suggested, residents wishing to sell will be in limbo – will they be compensated?
- Should the proposal succeed, what provisions have been put in place to maintain the smallholding/farming scheme?
- Wokefield Park works with the local community to ensure any events held have minimal impact on the local residents with regard to noise and disruption.
- Another request for sites should be made, to allow more suitable sites to come forward.
- Romany Gypsies insist on a site under their Human Rights and Romania being part of the EU, will the existing sites and proposed sites which are currently of Irish descent accept this integration or will it mean yet another site has to be found?
- There are more and more developments being imposed on us changing the nature of the area, affecting lifestyles and house prices.
- Conflict of interest as West Berkshire Assets Team put forward the site to West Berkshire Planning team as a potential site.
- It is not considered that there is an immediate need for any site, especially one of 8 pitches in the area, and the site would be inappropriate on agricultural land.
- I consider the siting of this development is a political decision as the impact will be more for Grazeley people who vote in Wokingham.
- I fail to see how this site will benefit us as permanent longstanding 'council tax' paying residents. We hope Grazeley remains a safe, clean tranquil community.

2. Core Strategy policy CS7

- The proposed site would not sufficiently fit the criteria as set out in policy CS7 and an alternative site should be considered.
- Contrary to adopted Core Strategy policy.
- Criteria all suggest rejection of the site, but the site is recommended on very weak grounds. Lack of footpaths, lighting or public transport would not satisfy the planning criteria.

3. Consultation process

- West Berkshire Council did not inform me of the proposals – it feels like they are trying to sneak this through with minimum number of people being aware of the situation.

- The Council's handling of this process has been undemocratic and unacceptable in denying local residents, both residential and small businesses, the opportunity to comment.
- Wokefield PC was not directly consulted about the proposal.
- Deeply concerned at the way the consultation process has been conducted.
- West Berkshire's correspondence to those properties within 100m of the site would indicate that the Council's view of those directly affected may even be limited to just this scope.
- Support for consultation and Council Officers willingness to attend a meeting with the Parish Council and local residents. However, given WBCs need to meet Government timetables, vitally important information relevant to the site has not been available – undermining the process as not all relevant facts were known at time of consultation.
- No mention of Thames Valley Policy being consulted.

4. Existing sites

- There is already a Gypsy and Traveller site at Kybe Lane (1 mile away).
- Other traveller sites in Wokingham have been placed on no-through roads, presumably to address safety issues for children and animals.
- Extending area already occupied by Gypsies and Travellers would seem more preferable, offering them a better amenities and a more comfortable lifestyle.
- No convincing reason to justify another Gypsy and Traveller site in the local area – disproportionate and unjustified.
- Why can't you add 2 pitches to each of your 4 existing sites?
- We have been surrounded by gypsy sites on all sides locally – A33, Tadley, Burghfield, Aldermaston and Kybes Lane Grazeley.
- The area already has a number of Gypsy and Traveller sites. By concentrating more sites within such a small area the travellers may feel stressed by competing cultures.
- Development of this site would seem more problematic than increasing capacity at existing sites. Less impact and more cost effective.
- Already traveller sites in local area. The rest of the District must do its part to support traveller communities, our area has several.

5. Covenant

- WBCs first fact finding requirement should have been to establish whether there was any legal reason preventing the proposal from proceeding – to check whether any covenant or other restriction applied.
- There is a covenant on the site which dates back to 1935 from the Palmer family and states no caravans should be placed on the land.
- Any pursuit of the proposal will render West Berks Council in breach of covenant.

- It is doubted that the site is deliverable because of a covenant on the land.
- WBC appears to be in denial of the covenant, despite the provision of Land Registry documentation.
- Concerned at time taken to consider the restrictive covenant.
- When the land was purchased by Berkshire County Council it was done so for the purpose of a route for entry into agriculture for young farmers, if this covenant has not been revoked this proposal may not be legal.

6. Scheme details

- Detailed site drawings have not been provided with the proposal preventing anyone from knowing how the 8 pitches and amenity blocks are to be located on the site together with any access roads, play areas, community centres etc.
- It is not clear how many traveller vans would be supported – does 8 pitches mean 8 vans? How big is a family? There could be unlimited people living on the site.
- The fact the plan states that; the precise boundary of this site and its capacity is still to be confirmed; leads me to believe it has the potential to grow and become a 'Dale Farm' situation.
- Propose the Council confirm the numbers of permanent pitches and travelling pitches that are to be on the site.
- Propose the Council confirms the boundaries and also will there by an intentions on expanding the site.
- Concern that the site might subsequently extend to adjoining land owned by WBC.
- The Guide (Designing Gypsy and Traveller Sites) makes mention to a number of elements regarding the site layout, including the orientation of pitches and distances between vehicles/caravans, turning space and access points for emergency vehicles.
- It would not appear that the site will be of sufficient size to accommodate 8 pitches in accordance with the best practice Guidance. The site cannot be considered suitable.

7. AWE

- Preferred Option 40 lies within the outer consultation zone of the AWE Burghfield site and ONR would expect to be consulted on any future planning application and our representation will be based on the potential impact of the version of the off-site emergency plans that are current at the time the applications are made.
- The site may lie within the Burghfield detailed emergency planning zone, should this be extended following review.
- When considering sites for Gypsy and Traveller accommodation, they should be located outside the detailed emergency planning zone around nuclear sites, and the distance from a nuclear site is taken into account when selecting such sites,

so that potential sites are more distant from the nuclear site being preferred over those that are closer, so far as is reasonably practicable to do so.

8. Infrastructure

- No footpaths or streetlights.
- The site is close to Reading and Basingstoke railway line – placing young families at high risk.
- No mains drainage or gas supply.
- No fire hydrant, although there is one marked on the map, Berkshire Fire brigade have been unable to locate it.
- High voltage overhead cables suspended by pylons run across both Bloomfield Hatch Lane and Cross Lane – in close proximity to the site and at a low point.
- Network Rail Emergency and Maintenance Rail access point is located adjacent to the Cross Lane junction.
- This is a rural area with limited infrastructure and cannot comfortably support this development.
- The proposed site is adjacent to an electricity pylon with high voltage lines passing over it – its close proximity has given rise to health hazards, particularly with children.
- Proposed site is not sustainable – it would not be acceptable for residential development so why is it considered acceptable for eight pitches?
- The Guide (Designing Gypsy and Traveller Sites) make specific reference to sites close to electricity pylons as being unlikely to be suitable – electricity pylons cross near to the site which would seem to be in conflict with the Guide.
- The Clappers Farm site, being entirely rural and not on the edge of any large town or city, would not meet the preference set out in the Guidance.

Water supply

- No access to Thames Water main supply. Water to the surrounding properties is gained via Wokefield Park – a private supply with no capacity for additional requirements.
- The water pressure is very low.
- Water is not supplied by Thames Water – there is not mains drainage. TW take no responsibility for the water supply.
- Adding more strain on an already underperforming water supply system would be unacceptable.
- To install new water mains will be a very large cost to the tax payers of Berkshire.

Foul drainage

- Not connected to a mains sewer – it is recommended that where feasible sites connect to a mains sewer to reduce risk of pollution to controlled waters. Where connection to main sewer is not feasible, a package treatment plant can be considered. Septic tanks should only be considered if it can be demonstrated that discharge into a public sewer to be treated at a public sewage treatment works or package sewerage treatment plant is not feasible.
- It is expected that foul drainage at the allocated sites is to be addressed in this document. Any policy should include the requirement for a foul drainage scheme.
- No access to mains sewerage from the site. Septic tanks are used in the local area.
- No mains drainage or gas supply.

Schools

- Nearest schools are already oversubscribed (St John's and St Mary's).
- Grazeley Primary school does not have any spare capacity and is unable to expand.
- No safe pedestrian route to the schools (3 - 4km away).
- Local school in Grazeley is not under Wokingham education authority and is currently over capacity.

Services and facilities

- Grazeley Village is approx. 1 mile from the site entrance and Mortimer village is approx. 3.5 miles from the site entrance.
- Grazeley has a school but no shops or health services.
- Mortimer would be the nearest centre for services and facilities.
- Mortimer is also expected to accommodate more than 100 homes, so this will impact on services and facilities in Mortimer.
- Local services can not be reached safely by walking or cycling.
- Site is approximately 4km from Spencer's Wood, and 4km from Mortimer – not easily accessible.
- Local services are not available by foot.
- Given the location of services and facilities (3-4km) all ingress and egress from the site will be by motor vehicle.
- Although local planning authorities are required to identify a supply of specific deliverable sites, they should be offered in a suitable location. The site is not close to services and facilities and is wholly unsuitable for such purpose.
- The nearest health surgery is a doctor short, and is unable to recruit – resources are clearly inadequate in this area.
- Previous housing applications have been refused for being more than 2km from local shops, so it would appear that if a consistent approach was taken this site would also be ruled out.

9. Highways and transport

Highways

- Site is situated on a busy sharp narrow corner in the road, over a railway.
- A number of road traffic accidents in recent years.
- Additional traffic involving articulated trailers on this corner would significantly increase the risk.
- Cross Lane is narrow, with poor visibility.
- Traffic does not observe the 40mph speed limit so caravans will be at greater risk if pulling out of Cross Lane.
- Cross Lane is poorly maintained, critical for local farming access.
- Cross Lane and Bloomfield Hatch Lane junction is a blind corner and a main road from the M4 to Mortimer and villages beyond.
- The local roads get very busy at peak times and the site will only increase the traffic in the area.
- Road safety is of great concern.
- The Council has always been rigorous in applying road safety to planning applications – it needs to be consistent when it itself is the applicant.
- Access to Cross Lane from Bloomfield Hatch Lane is very restricted due to blind bend, narrow section over the railway bridge (Alfreys Bridge number BKE31/15).
- It is not possible for HGVs to pass each other over the bridge without a potential collision. There is no priority in either direction and the speed limit is rarely observed.
- Increased usage of the junction will impact on the safety for its users.
- The approach to the site from SE along Cross Lane is a single track with a hump-backed bridge, prone to flooding. Continued heavy usage will cause damage to the road surface and hedgerows.
- Locating a site here is a tragedy waiting to happen – there have been numerous accidents at this spot, including fatalities.
- Propose the Council carry out a survey on the disruption that this site would cause as the roads are in poor condition and extremely busy already.
- Improved road widening/visibility/access would need to be addressed in what is a fundamentally rural area.
- Local roads are often used as ‘rat runs’ and therefore not suitable for children walking to school or people walking to shops.
- Bloomfield Hatch Lane is very busy, especially during peak times.
- The aerial photos show the position of the narrow railway bridge, which has an ‘adverse camber’ warning, together with a sharp bend at the junction.

Public transport

- In terms of public transport services the site is not connected to such services – poorly connected.
- No regular buses.
- No public transport in the area, except for the railway train station in Mortimer which would necessitate walking on a major distributor road.

10. Flood risk

- Cross Lane to the south of the site floods.
- Your assessment states that no flooding occurs – last year both roads were impassable due to heavy rainfall for several days repeatedly over several months.
- No direct flooding on the site but Cross Lane does flood after heavy rainfall, closing the road.
- The terrain is clay based and becomes very boggy and unsuitable for caravans and mobile homes.

11. Environment

- The site is in a rural location – the use of the already busy roads by caravans, vans and lorries will cause more noise, pollution and disruption to what should be a quiet location.
- The site could generate noise.
- Mature hedging around the site does not block out the site from first floor level.
- Insufficient screening of site in winter – impacting on privacy and amenity.
- Old farm buildings on the site are habitats for wildlife, in particular protected bats and barn owls.
- Bats and their roosts are legally protected by both domestic and international legislation. The Bat Conservation Trust should be contacted.
- The site will visually harm the character of the area.
- The current buildings on the site are Grade 2 Listed status.
- Access to the site would require considerable harm to existing mature hedgerows, and a comprehensive study of the environmental impact must be considered prior to any development.
- Mature hedgerow surrounding the site is only due to bad maintenance this summer. In previous years this site is highly visible from the road and neighbouring properties.

- The Parish Council has just learned from WBC that the proposal will almost certainly involve the demolition of the existing farm buildings – this should have been made clear from the outset of the consultation. The buildings are known to be the habitat of protected species such as bats and owls – it would be inappropriate to demolish the buildings and disturb the natural habitat of wildlife.

Surrounding environment

- The site relates poorly to its surrounding population size and density.
- Small community of 4 residential dwellings, and this site would dominate the local area.
- Rather remote location.
- Existing settled community is very small; the introduction of 8 traveller pitches would result in the traveller community wholly dominating the area. The site would not meet the needs of the Gypsy and Traveller community and would not support sustainable communities.
- Local planning authorities have to relate the number of pitches to the circumstances of the specific size and location of the site. The site relates poorly with its surrounding population size and density.
- The proposed site being in such close proximity to residential dwellings will negatively affect the amenity of its residents.
- The site will not comply with policy C of the PPTS as it would dominate the existing community.
- The site will impact on the local households – 8 planned vans will total 40 people, which will outnumber the local households as there are only 17 people within 150 metres of the site.
- One of the most remote locations of West Berkshire thereby far away from Council surveillance and supervision.
- The site is surrounded on three sides by residential dwellings - such close proximity almost inevitably is going to cause tensions.
- Screening of the site in winter is inadequate, and there will be a lack of privacy to both the existing houses and the site.
- Site is close to existing properties – homes and industrial.
- The site is 100m from four established residential properties.
- The site is in an isolated location.
- Impact on quality of life of existing local residents.

Council response:

Clappers Farm is within the Council's landownership. Consultation was undertaken on the site at the junction of Bloomfield Hatch Lane with Cross Lane. However, the site will only be needed in the later part of the Plan period and the Council have commissioned further work to examine the whole of the Clappers Farm landholding

to identify the most appropriate location for the gypsy and traveller site. It is therefore proposed that the Clappers Farm site identified in the Preferred Options consultation is replaced with an area of search covering the whole of Clappers Farm.

The consultation process undertaken, process of site identification and justification and relationship with Core Strategy Policy CS7:

Potential sites for accommodating gypsies, travellers and travelling showpeople, including Clappers Farm were identified following a 'call for sites' undertaken during April/May 2014, with the aim of identifying land to meet the Council's requirement to accommodate Gypsies and Travellers and Travelling Showpeople. Landowners and developers were contacted and invited to submit sites available to meet these needs. Five sites were submitted during this process. In addition, the Council considered a further 5 sites including a site in unauthorised use, a site submitted in the Strategic Housing Land Availability Assessment, a site with lapsed planning consent and two in council ownership – Clappers Farm . This site was suggested could accommodate up to 8 permanent gypsy pitches with further work being needed to determine the exact number of pitches. Therefore, in total 10 potential sites were identified.

Each site was assessed for its suitability for this use against the criteria set out in Core Strategy Policy CS7, together with any known constraints and with regard to guidance set out in the National Planning Policy Framework and Planning Policy for Traveller Sites. A Sustainability Appraisal and Strategic Environmental Assessment was undertaken to assist in assessing the sustainability of each of the sites for development. These site assessments form Appendix 10 of the Sustainability Appraisal (SA).

Public consultation on the sites was undertaken between 25 July and 12 September 2014. This process was widely advertised and a letter sent to each parish council and to homeowners of properties within 100m of the sites.

Needs Assessment for Gypsies, Travellers and Travelling Showpeople:

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

The Council commissioned Opinion Research Services to undertake a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). This study will be published shortly and sets out the level of need which is required within West Berkshire in the period between 2014 and 2029. Overall the study identifies a requirement for 17 permanent pitches for gypsies and travellers and 24 plots for

travelling showpeople. The timeframe over which these should be provided is 4 pitches 2014-2019, 6 pitches 2019-2024 and 7 pitches 2024-2029. The sites identified in the preferred options consultation would meet the identified level of need.

Education issue:

Any children accommodated on the site would access education in the same way as the settled population.

Sustainable location issue:

The Sustainability Appraisal does not identify significant negative impacts on environmental, social or economic factors, though it is recognised that access to public transport and is poor and facilities are not in easy walking or cycling distance. A number of mitigation measures are shown and would be required to offset the impact of the development. This includes, for example, highway improvements to improve visibility and sensitive design, layout and siting of the development to minimise its visual impact. The mitigation measures needed for the site will be set out in planning requirements for the development for any site within the area of search.

National planning policy does seek to restrict Gypsy and Traveller sites being located in the open countryside. However, despite its location, the site is in reasonable proximity to local services and facilities at both Spencers Wood and Stratfield Mortimer. The SA does not identify significant adverse sustainability impacts from the development.

Access to facilities issue

Whilst the site is outside of a settlement boundary, a range of facilities and services would be provided in Spencers Wood or Mortimer both of which are approximately 4 km from the site. A primary school is located at Grazeley approximately 1.5km from the site.

The planning process and planning requirements for the development of the site:

Any site coming forward for a gypsies and travellers would be subject to the normal planning application process. As part of the area of search allocation, planning requirements will be set out and will need to be addressed as part of any planning application made for the development of the site. This will include for example, the need for additional landscaping/fencing, the number of pitches and service provision. These would be included as conditions of any planning permission and some may be

required to be implemented before any development occurs. The Council has enforcement powers if any conditions are not complied with.

Scale of the proposed site and appropriateness in a rural location:

National policy contained in the Planning Policy for Traveller Sites , March 2012, para 23 states that local planning authorities should strictly limit new traveller development in the open countryside and ensure that sites in rural areas respect the scale of and do not dominate the nearest settled community and avoid placing undue pressure on local infrastructure. Though the exact number of plots is still under examination, if 8 plots are assumed, the resulting population is likely to be around 36 residents. The surrounding population is dispersed in nature but this scale of increase cannot be assessed as dominating the local population.

The issue of whether the proposal would dominate the rural area is affected by the design and layout of the proposed site as well as additional landscaping required. The Sustainability Appraisal indicates that sensitive design, layout and siting of the development and landscaping will be needed to mitigate the visual impact arising from the site. This will form an important part of the work the Council will undertake to evaluate Clappers Farm broad area of search to identify the best site.

Highway issues

The daily vehicle movements from residents accessing services and facilities are likely to increase. Although the site is to be replaced by an area of search, if this site comes forward, sight lines will need to be improved at the access point onto Cross Lane and this will be included as a planning requirement for the site. Investigations into the road traffic accident data show there has been one accident resulting in slight injuries since 2011.

Access to medical facilities

Access to doctors' surgeries is currently under pressure at a national level leading to increases in waiting times for appointments. Residents on the site would register with the nearest practice with space on their books.

Consultation Zone

The site lies on hedge of the outer consultation zone of the AWE Burghfield site and ONR require to be consulted on any planning application which will be included as a planning requirement in the Plan. The Burghfield detailed emergency planning zone is under review but conclusions are not yet available.

Proximity to electricity pylons

Sensitive design, layout and siting of the development as well as landscaping will provide a buffer between the development and the pylons.

Flooding

The proposed site is not located within a flood zone and there is no evidence of flood risk issues on this specific site, though this will need to be taken into account if a different site is selected on Clappers farm.

Alternative Sites

The sites considered by the council included those that came forward in the call for sites plus three additional sites including a site in unauthorised use, a site submitted in the Strategic Housing Land Availability Assessment and one in council ownership – Clappers Farm. Each of these sites underwent a Sustainability Appraisal and site assessment which were used to select the preferred sites.

Covenant

The council acknowledge the presence of a covenant on the proposed site. It is the view of council officers that the covenant can potentially be overcome and does not prevent development taking place on the site.

Existing buildings on the site and protected species

The buildings on the site are disused farm buildings and are not listed. An investigation needs to be undertaken to examine if protected species are present in the buildings. Therefore, planning requirements for development of the site will include the need for bat and barn owl surveys to be undertaken as well as a Phase 1 Habitat Survey and appropriate provision to be made if protected species are present.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Sites for Gypsies, Travellers and Travelling Showpeople – GTTS9: Padworth Farm, Rag Hill, Aldermaston

Responses received: 10

1. General

Consultation comments:

- Previous permission was granted based on mitigation measures to allow shelter of the occupants of the caravan within the adjacent house. This mitigation measure may not be available should the allocation proceed.
- Suggest removing the site as a potential allocation.
- Object to the site due to size and lack of support from local community.
- Previous permission on the site does not make it the right site to develop.
- Site is unlikely to be available.
- Support for the allocation of this site.

Council response:

The landowner has been contacted as part of the public consultation process and no response has been received. It has therefore not been possible to confirm or not whether the site is available for this purpose. Sufficient capacity elsewhere has been identified to meet the assessed need of 17 permanent pitches. It is therefore not proposed to allocate this site for this use.

2. AWE

Consultation comments:

- Padworth Farm (GTTS9) is within the AWE Aldermaston detailed emergency planning zones (DEPZ).
- Mobile homes/caravans do not provide significant protection against ionising radiation, or the ingress and subsequent inhalation of radioactive material.
- Adoption of GTTS9 as an allocation would place additional persons at risk of harm and therefore ONR discourage the use of GTTS9 for traveller pitch provision.
- ONR would recommend sites for the travelling community are located outside the DEPZ around nuclear sites and that the distance from nuclear sites is taken into consideration when selecting such sites, with potential sites further from nuclear sites being preferred over those that are closer so far as is reasonably practicable to do so.

- Concern over availability and suitability of the site given its location with the DEPZ.
- ONR raised concern with the previous permission due to the location of the site with the DEPZ. Mitigation was provided but this may not be available should the site be allocated and granted permission for a new occupier.

Council response:

The principle of development has already been accepted on this site and suitable mitigation arrangements were established given its location within the detailed emergency planning zone (DEPZ). As the application has now lapsed any new application would be required to demonstrate a suitable mitigation scheme. As the landowner has not confirmed they are willing to support the development of the site for this purpose it has not been possible to verify that the previous mitigation measures agreed would still be possible. It is therefore not proposed to allocate this site for development.

3. Environment

Consultation comments:

- Padworth Farm (GTTS9) is in close proximity to Great Fishers Local Wildlife Site – a site of county importance. Policy CS17 of Core Strategy seeks to protect such sites.
- BBOWT are concerned about adverse impacts on the Local Wildlife Site either directly or indirectly.
- Should the site be allocated appropriate avoidance and mitigation measures will be required to ensure any development would proactively contribute to protecting and enhancing the Local Wildlife Site and that it complies with policy. In the absence of these measures the allocation would be unsound.
- Natural England are concerned that no clear evidence has been set out to support or indicate reasons for preference of selected sites therefore the DPD is unsound.
- Discussion with Natural England is recommended.
- Object to the proposal to allocate Padworth Farm (GTTS9) on ecological sustainability grounds – through both direct and indirect damage.
- West Berkshire is a beautiful place to live and has a large number of SSSIs, SACs and nature reserves – protect the diverse ecology of the District.
- Develop on sites which are not so close to ecologically important and sensitive sites/locations.

Council response:

The principle of this site being suitable for a single gypsy and travellers pitch was established through the previous planning permission for this use on the site. However, the landowner has not confirmed that the site is available to be developed for this purpose and therefore the Council do not propose to allocate the site in the Housing Site Allocations Plan.

4. Foul drainage

Consultation comments:

- Padworth Farm (GTTS9) is not close to a mains sewer connection.
- It is recommended that sites are put forward where it is feasible to connect to mains the sewer to ensure no risk of pollution to controlled waters.
- Where this is not feasible a package treatment plant can be considered. Septic tanks should only be considered if it can be clearly demonstrated that discharge into a public sewer to be treated at a public sewage treatment works or a package sewage treatment plant is not feasible.
- It is expected that foul drainage will be addressed in this DPD.
- It is strongly recommended that pollution to controlled waters from effluent is understood through the production of a foul drainage scheme. Without this the plan is unsound.

Council response

The principle of this site being suitable for a single gypsy and travellers pitch was established through the previous planning permission for this use on the site. The provision of a suitable waste water facility would be a planning requirement for bringing forward the site and would be verified through the planning application process. However, given that the landowner has not confirmed the site is available for this development it is not proposed to allocate this site.

5. Highways

Consultation comments:

- Concern over increased traffic on narrow lane.

Council response:

The small increase in expected levels of traffic movement would not give rise to significant concerns. However it is not proposed to allocate this site given the landowners has not confirmed the site is available for development.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Gypsy and Traveller Rejected Sites

Responses received: 3

GTTS8: Stable View, Oare

Consultation comments:

- Agree with decision to reject site at Stable View in Oare (GTTS8) as a preferred option for a traveller site.
- Objections from the Parish Council to previous applications and appeals on the site (Stable View) still stand.

Council response:

Comments noted.

GTTS7: Purley Rise, Purley-on-Thames

Consultation comments:

- Notes the site in Purley-on Thames (GTTS7) is not a preferred option but draws attention to issues and objection raised against the site (also EUA035).
- The site is not within current settlement boundary and acts as a buffer between settlements.
- Development of the site would require new access which would increase traffic flows and increase the risk of traffic accidents.

Council response

Comments noted.

GTTS7 is not a preferred option for a traveller site, but it is a preferred option for housing (EUA035). GTTS7 was rejected in favour of other proposed sites.

GTTS3: Benhams Farm, Burghfield

Consultation comments:

- Objects to the site at Benhams Farm in Burghfield (GTTS3) being used as a traveller site.
- Local school (Mrs Blands) already accommodates a higher than average number of traveller children.

- Size of the site proposed is too large.
- Village has insufficient infrastructure to support existing population.
- Concerned about the number of planning applications / amount of development taking place / proposed in and around Burghfield.
- Would prefer smaller number of sites (housing and traveller sites) to be spread across West Berkshire to minimise the impact of development.

Council response:

GTTS3 has been rejected as a preferred option allocation for a traveller site in favour of other proposed sites.

Bringing development sites forward through the plan-led process allows a holistic approach to be taken across the District, ensuring an appropriate distribution of development along with the timely delivery of necessary associated infrastructure.

The Housing Site Allocations DPD proposes a number of housing and traveller sites across the District in accordance with the framework set out within the Council's Core Strategy.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: General, Introduction and Context Comments Housing Site Allocations DPD

1. General Comments

Consultation responses:

- Ancient woodland must be given absolute protection and development should be kept as far away as possible.
- The supporting text is not always reflected in the policy to which it relates.
- Plan seeks to freeze any new development in the countryside. Remote villages and hamlets need some development to provide for a developing community.
- Settlement boundaries should not be used to restrict otherwise sustainable development in the countryside and is contrary to the NPPF. National Planning Guidance also advises that all settlements can play a role in delivering sustainable development so blanket restriction policies should be avoided.

Council response:

Ancient woodland is protected as a Habitat and Species of Principal Importance for Biodiversity in England under Section 41 of the Natural Environment and Rural Communities Act 2006. It is covered under Core Strategy Policy CS17 and any development proposals affecting ancient woodland would need to take this policy into account. Appropriate buffers are required where development is proposed close to Ancient Woodland.

A number of revisions are proposed to the countryside policies and the supporting text in response to comments made. The clarity of the link between the text and policy has been looked at as part of this process.

Core Strategy policy ADPP1 sets out the strategy for accommodating future development within West Berkshire. This policy identifies the broad levels of development expected to be accommodated within each of the different sizes of settlement. It is proposed to amend Policy 1 to identify the smaller villages in the settlement hierarchy and to provide clarity on the approach to development in the villages with no defined settlement boundary. Overall, the planning policies limit development to more sustainable locations which is wholly consistent with National Planning Policy Framework (NPPF) guidance.

2. Comments on the Introduction

Consultation responses:

- Policies in the Plan should seek to protect and enhance biodiversity and achieve a net gain through the planning process
- Need to take account of infrastructure requirements e.g. school places. Home to school transport costs could lead to additional costs to the council.

- A comprehensive re-assessment of all settlement boundaries is required.
- Need to make clear the distinction between AONB and other land.
- Allowing development within revised settlement boundaries needs to be weighed carefully against the loss of land around settlements of lower agricultural land quality. The use of Natural Character Areas would be a robust basis for decisions
- Paragraph 2.8 needs clarification.
- The Core Strategy does not meet objectively assessed needs and the document should be amended to reflect the increased level of need that the SHMA will inevitably show. The policy context is therefore out of date.
- The Housing Site Allocations DPD is not in accordance with the NPPF. Para 1.4 combines rural landscape and AONB together to conserve and enhance and the NPPF no longer seeks to protect the countryside for its own sake.

Council response:

Protecting biodiversity and seeking net overall gains is already covered by Core Strategy Policy CS17.

The settlement hierarchy set out in Core Strategy policy ADDP1 seeks to focus development in the most sustainable locations, with only limited development in service villages, smaller villages and the open countryside. Contributions towards necessary infrastructure provision will be funded through the Community Infrastructure Levy.

The Council has an adopted Core Strategy with a housing requirement of 10,500 net additional dwellings. The Housing Site Allocations DPD seeks to identify housing sites in order to meet this figure with some additional flexibility added. A new Local Plan to take into account the longer term requirements arising from the Berkshire Strategic Housing Market Assessment (SHMA) will be produced once the DPD has been adopted.

Housing sites submitted for consideration for development have undergone a process of site assessment and where appropriate sustainability appraisal. The best reasonable alternatives have been selected for inclusion in the Housing Site Allocations DPD. A number of these sites adjoin existing settlements and lie outside the current settlement boundary. In these cases, it is proposed to amend the settlement boundary in the proposed submission version of the plan. Following the completion of the Strategic Housing Market Assessment, the appropriate level of housing requirement will be reviewed. A review of the Local Plan will then be undertaken to examine the most appropriate means of meeting this new figure and all settlements will again be examined to identify sustainable locations. As part of this process, settlement boundaries will need to be reviewed. Agricultural land quality and landscape quality will form part of these assessments.

Policy ADDP5 covers the North Wessex Downs AONB and the level, location and type of development that is permitted. The countryside policies make reference to the AONB where appropriate but it is not proposed to duplicate the policy guidance contained in the Core Strategy.

Amendments are proposed to paragraph 2.8 to provide more clarity on housing development in the countryside outside the AONB.

3. Comments on the Planning Context

Consultation responses:

- Para 2.4 should include a positive approach towards development in the AONB providing that great weight is placed on the landscape.
- Landscape character assessment is too simple a tool to judge the impact of any particular development.
- The text does not make clear that there is a fundamental difference in housing development in the AONB and other parts of the countryside. No indication is given of the scale of development which will be allowed to take place in the countryside. The text fails to make clear that the location of most new housing shall be in accordance with policies ADPP4-6. Development should be focussed in the rural service centres and severe restraint imposed on all new housing development in the AONB. Exceptional circumstances are only required in relation to major development in the AONB and this distinction should be made clear in the text.
- The text under the sub heading `Rural Areas outside the AONB` should reflect the difference between major development in the AONB and development in other parts of the countryside. Sub section `Assessing the Impact of development on landscape character` is not clear if it applies to the AONB or any open countryside.
- The text provides inappropriate context for the policies which follow.
- The presumption in favour of sustainable development applies in protected areas such as the AONB or historic environment but objectively assessed needs should not be met in these areas.
- Section 2 does not reflect the West Berkshire Core Strategy or NPPF
- Para 2.8 assumes residential development in the countryside outside settlement boundaries will be harmful. ENV20 would be consistent with the NPPF and provides a means of achieving environmental improvements.
- Section 2.10 should include `proportionate` in the second sentence before `landscape and visual impact assessment`.
- Para 2.2 needs to take into account local needs as well as the need to protect the AONB.
- The housing requirement is based on the South East Plan which is out of date and not based on objectively assessed needs. Para 1.1 needs to be amended as the Core Strategy is not considered to be up to date and the adopted housing requirement a minimum figure only.

Council response:

The purpose of the text is to give some context to the policies which follow and to make clear the difference in approach to development in the countryside and AONB. It is considered that Section 2 provides a useful role in explaining the planning policy. It is proposed to retain this section but to revise some of the text to more clearly distinguish between the difference in approach to development within the AONB and

the wider countryside and to emphasise the restrictive approach to development in the AONB.

The current position on the Core Strategy and its relationship with meeting objectively assessed housing needs forms part of the context within the overall document. Rather than duplicating information set out earlier in the document it is proposed to delete this information from the introduction and focus on the context of the rural area.

The principle of judging development against Landscape Character Assessments is included in Core Strategy Policy 19. It is proposed to amend para 2.9 to make it clear that Landscape Character Assessments apply to both the AONB and the wider countryside.

Development in the countryside outside the AONB is covered in para 2.8 but it is proposed to amend the text to make it clearer what development is acceptable in principle in the countryside locations.

It is proposed to amend para 2.10 to include that landscape and visual impact assessments will be sought where appropriate.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 1 Location of New Housing

1. Policy 1 is inconsistent with national policy guidance:

Consultation comments:

- It is not the most appropriate strategy when considered against reasonable alternatives.
- The Plan does not meet objectively assessed development needs, including unmet needs from adjoining boroughs. The Plan is unsound as the 10,500 dwellings are not justified by an assessment which meets the requirements of the NPPF and the level of planned provision is well below actual housing need. The Council has not progressed the SHMA to address the position and therefore cannot reflect cross boundary strategic issues. The restrictive countryside policies fail to take account of the objectively assessed housing needs identified in an emerging SHMA. The Council will not be in a position to demonstrate a 5 year supply of deliverable housing sites and seeks to restrict development outside settlement boundaries without establishing this.
- The Plan does not have site allocations and policies to guide site selection so does not meet the requirements of national planning policy.
- The plan should be withdrawn and a single local plan delivering the requirements of the NPPF should be prepared.
- Policy adopts an unnecessarily restrictive approach in respect of new housing in the countryside and AONB and should allow for infill development outside of the settlement boundaries subject to criteria.

Council response:

The broad strategy for considering residential development in the countryside is covered by the adopted Core Strategy Policy ADPP1. This sets out the level of housing provision to be met over the Plan period, with a settlement hierarchy indicating how this level of development will be distributed. The absence of a Strategic Housing Market Assessment (SHMA) was recognised by the Inspector at the Core Strategy examination and the commitment to undertake the study was agreed by the Council. Whilst this work is being undertaken in conjunction with other councils, the Housing Site Allocations DPD has been prepared and is well advanced having undertaken preferred options consultation in 2014 to identify sites to meet the identified Core Strategy housing requirement. The purpose of this approach has been to significantly boost the supply of housing in the short to medium term, in accordance with the principles of the National Planning Policy Framework (NPPF). Alongside this, work is now complete on the preparation of a SHMA to help inform the production of a review of the Core Strategy's housing requirement.

The Sustainability Appraisal process considered that there were no reasonable alternatives to this policy given that selected settlement boundaries (i.e. those in the settlement hierarchy only) were being reviewed at this stage, prior to a holistic review

being undertaken for the new Local Plan which will be undertaken once the Housing Site Allocations DPD has been adopted and the SHMA work completed.

The boundaries of settlements within Policy HSG1 are being revised by the Housing Site Allocations DPD where specific housing allocations are identified to meet the Core Strategy housing target (i.e. within the settlement hierarchy). The settlement hierarchy indicates the focus of new development will be in more urban locations, with other settlements taking a smaller share. A five year housing land supply has been identified in the District. Therefore, outside settlement boundaries, development will continue to be resisted unless a countryside location is required to meet an essential local rural need or to support rural diversification. Planning Practice Guidance states that there should be no blanket policies restricting housing development in rural areas unless supported by robust evidence. Policy 1 is therefore proposed to be amended to include criteria for considering limited housing development in villages with no settlement boundary outside of the AONB.

2. Suggested changes to Policy 1

Consultation comments:

- Policy 1 does not adequately explain the presumption in favour of sustainable development. There are no site allocations and no policy to guide site selection.
- Saved policy HSG1 contains settlements washed over by the AONB and the presumption in favour of development in these locations is inconsistent with the NPPF.
- The title of the policy should reflect that it refers to development inside and outside the settlement boundaries of settlements and development should be referred to as sustainable development.
- Too much development in Thatcham is proposed and infrastructure has had little growth.

Council response:

Housing site allocations will be included in the Housing Site Allocations DPD and were included in the document consulted on in July 2014. Housing in the countryside policies will form a section of this document, at the plan submission stage, bringing the two documents together. Achieving sustainable development is embedded in the overall approach within the Core Strategy and Housing Site Allocations policies which seek to focus development where there is best access to services and facilities. It is therefore not considered necessary to repeat the word sustainable in references to a `presumption in favour of development.`

Core Strategy policy ADPP5 identifies a housing requirement of up to 2,000 dwellings in the AONB to be focused in the rural service centres and service villages. Therefore, there is an element of development already planned within the AONB, through the adopted Core Strategy, which is focused on the most sustainable settlements, including the service villages and smaller villages will only accommodate limited development is considered to be consistent with the NPPF.

Thatcham is identified in the Core Strategy as an urban area and a focus for new development. Policy ADPP3 sets out the requirements for development in Thatcham. Also, Core Strategy Policy CS5 sets out the approach to the provision of infrastructure within the settlements and the schedule of infrastructure is set out in Appendix D of the Core Strategy.

The title of the policy is considered to be clear but it is proposed to make it explicit that the housing relates to housing in the countryside only.

3. Suggested additional policy criteria

Consultation comments:

- Policy needs to recognise potential for an exceptional circumstance of a new home in the countryside of outstanding architectural merit
- The presumption for sustainable development should be extended beyond the existing settlement boundaries. The policy should be amended to say that if a 5 year housing land supply cannot be achieved there is a presumption in favour of development outside the settlement boundaries on the edges of the settlements. Settlement boundaries should not be used as a mechanism to restrict otherwise sustainable development. Policy 1 should allow limited or small scale infill development outside the settlement boundaries as a blanket restriction is unduly restrictive. The NPPF does not give a presumption in favour of development inside settlement boundaries or indicate a more restrictive approach should be taken outside the boundaries.
- Sustainable development opportunities on the edges of large settlements are not comparable to remote small settlements and the policy should distinguish between these.

Council response:

Paragraph 55 of the NPPF sets out the special circumstances of developing a new home in the countryside where it is of exceptional quality or of an innovative nature. In this circumstance, any building has to be truly outstanding, raising standards of design in rural areas; reflect the highest standards in architecture; significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area. It is not proposed to duplicate this circumstance in Policy 1 but that a reference is added to the supporting text.

Sustainable housing development will be achieved through focusing development within the settlement boundaries or through adjustments to settlement boundaries of settlements listed in the settlement hierarchy. A five year land supply has been identified to achieve the Core Strategy housing requirements. Therefore, extending development beyond the settlement boundaries would undermine the approach taken. Policy ADDP1 clearly indicates that smaller settlements with settlement boundaries (those currently in policy HSG1 which are not included in the settlement hierarchy in ADPP1) will deliver appropriate levels of development in order to provide a sustainable pattern of development. Settlement boundaries are only proposed to be amended where site allocations are proposed as part of this Housing Site

Allocations plan, with a full review of all settlement boundaries taking place as part of the Local Plan review.

4. Supporting Evidence changes to amplify policy:

- Need to add an explicit statement that if an application does not meet the policy it will be refused.
- The supporting text does not support the policy by supporting a presumption in favour of development.
- The position is unclear regarding the settlement boundaries and saved policy HSG1. The retention of references to HSG 1 is confusing.
- Settlement boundary at Pangbourne should remain as originally drafted.
- Thames Water need to be able to provide specific comments on site proposals.

Council response:

National Planning advice set out in the NPPF contains a presumption in favour of sustainable development and the policies in the Housing Site Allocations DPD Housing in the Countryside reflect this advice. Planning applications are considered against all relevant policies and a view is taken as to whether the application is permitted or refused.

Pangbourne settlement boundary changes are considered under the specific site allocations.

Discussions have recently taken place with Thames Water to discuss detailed comments put forward in relation to each of the proposed site allocations.

5. Inclusion of a new policy

- There is no policy covering development of existing employment sites in the countryside.
- There is a need to include a policy for development on land outside the settlement boundaries. Restraint policies should apply outside settlement boundaries.

Council response:

The Housing Site Allocations DPD Preferred Options document only covers sites and policies where housing is being allocated. Unless an employment site is being allocated for residential development, existing employment sites and development proposals will be covered by policies in the adopted Core Strategy or the saved Local Plan policies.

A five year land supply has been identified in line with the adopted Core Strategy and extending development beyond the settlement boundaries would undermine the approach taken. Development on land outside the settlement boundaries is covered by Core Strategy policy ADDP1.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 2 Rural Exception Sites in the public consultation responses are:

1. Policy 2 is inconsistent with national policy guidance and changes sought to Policy 2:

Consultation comments:

- It is not the most appropriate strategy when considered against reasonable alternatives. It does not meet the objectively assessed development and infrastructure requirements of the district
- It is not the most appropriate strategy when considered against reasonable alternatives as sites should be identified to deliver objectively assessed needs
- The Plan does not adequately explain the policy on achieving sustainable development in rural areas as stated in para 54 of the National Planning Policy Framework (NPPF)
- The Plan should be withdrawn and progress made on a plan that delivers the requirements of the NPPF
- The policy is contrary to the NPPF which restricts development in designated areas such as AONBs. The presumption in favour of sustainable development does not apply in these areas. Policy ADPP5 sets a maximum number of dwellings to be achieved in the AONB and this could be exceeded if this policy is applied. The policy will lead to an unacceptable scale of housing development in unsustainable countryside locations
- The policy applies presumption in favour of rural exception housing outside settlement boundaries. This can apply to any site in the open countryside whereas it should be directed to within or adjacent to settlement boundaries. This will lead to an unacceptable scale of housing development in unsustainable countryside locations.
- The supporting text suggests that the policy would only be applied to rural communities, whereas areas outside larger settlements also serve the rural area and are more sustainable.
- Sites should not be remote from Rural Service Centres.
- Should redraft policy to remove the presumption in favour and replace with acknowledgement that permission will only be granted as an exception to policy.
- The presumption in favour should be removed and the exceptional nature of the policy acknowledged subject to meeting policy requirements or criteria
- The special qualities of the AONB and vernacular of the local area should be protected

Council response:

The Council believe that preparing the Housing Site Allocations DPD is the most appropriate means of achieving allocations to meet the housing requirements identified in the Core Strategy and is the quickest way of boosting the housing supply in the short to medium term.

Core Strategy Policy ADPP5 sets out policy guidance on development within the North Wessex Downs Area of Outstanding Natural Beauty, focusing development in rural service centres. This approach seeks an appropriate level of growth, whilst balancing this with the protection of the landscape quality. This is supported by Policy CS19 which sets out criteria to protect the landscape character, including within the AONB.

In addition to meeting general housing requirements, the NPPF para 54 requires plans to make provision for local needs for housing through identifying rural exception sites. Including a policy on rural exception sites housing is therefore considered to be consistent with national planning policy. Rural exception sites are by definition exceptions and therefore the housing they deliver is in addition to any housing requirement set out in the Local Plan.

Rural exception sites meet a specific local need which has been identified by a parish council within a local needs survey for a particular village or group of villages. Households must have an existing connection to the area according with the Council's Housing Allocations policy. The supporting text to Policy 2 sets out details of evidence required to substantiate such housing needs to ensure that such sites do not just meet general housing needs.

The apparent contradiction of terms between 'presumption in favour' of development in protected designated areas like the AONB is acknowledged. The NPPF para 14 is clear that there is a presumption in favour of sustainable development but at the same time indicates that rural exception sites are small sites which would not normally be used for housing. Minor rewording of the policy and supporting text is proposed to give greater emphasis to the exceptional nature of this type of development

Policy 2 was tested against two alternative approaches in the Sustainability Appraisal (September 2014). It was chosen as the preferred approach as it enabled the latest amendments in the NPPF relating to market housing at the discretion of the local authority, to be incorporated into the policy.

All policies in the plan need to be read in conjunction with the others. Achieving sustainable development is reflected in the overall approach to the Core Strategy and the policies in the Housing Site Allocations DPD. It is therefore considered unnecessary to repeat it in all the supporting policies.

2. Clear definition of terms used in Policy 2:

Consultation comments:

- Terms such as small scale and dominated, need to be more clearly defined and references to the role of the parish council need to be added.
- Rural exception sites need to be more clearly defined as this could include sites which are adjacent to a suburban area but just outside the settlement boundary. The number of homes built should be proportional to the scale of the adjacent settlement.

- Paragraph 3.8 should include a reference to foul drainage infrastructure as this is a particular problem for delivery of housing in the rural area.

Council response:

It is proposed to add a footnote which helps to define small scale as less than 10 dwellings, though the size achieved below this will be determined by the level of need identified in the local housing needs survey. Further definition of the relative scale of market housing to support the provision of affordable dwellings, will be added to para 3.12, relating it to the overall number of dwellings proposed on a site and the individual circumstances. A reference to the role of the parish council will be added to help clarify how the very local nature of the need leading to the development of an exception site will be established. Para 3.9 will be amended to add a reference to foul drainage as an example of the type of essential facilities.

3. Role of market housing in achieving rural housing:

- The supporting text should reflect national policy which sees market housing as enabling affordable housing provision to help meet objectively assessed needs rather than a restrictive viability approach.
- The council should be flexible in the approach to open market housing to bring forward more affordable housing units in the rural area of West Berkshire.

Council response:

Further definition of the relative scale of market houses to support the provision of affordable dwellings will be added to para 3.12, relating it to the overall number of dwellings proposed on the site and the individual circumstances of the site. The wording relating to the role of market housing to support the provision of additional affordable housing will be amended to make clearer the enabling role of the market housing where this circumstance applies.

The approach taken on the element of market housing on any rural exception site will vary according to the level of local need identified through the local housing survey and the particular circumstances of any identified site. It is not therefore possible to define the level of market housing that will be acceptable but it will only be acceptable where it is required to deliver the affordable element of the scheme in accordance with the viability requirement set out in the supporting text in paragraph 3.13.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 3 Design and Materials in the public consultation responses are:

1. Policy 3 consistency with national guidance and whether the policy should be retained:

Consultation comments:

- The policy covers a variety of policy issues and does not add anything to the Core Strategy policies CS14 and CS19 and should be deleted.
- It is not the most appropriate strategy when considered against reasonable alternatives. It does not adequately explain the approach to requiring good design and gives no guidance on overall scale, density, massing, light, landscape, layout, materials and access of new development
- Should be less presumption in favour of development within the AONB:

Council response:

The Sustainability Appraisal `Housing in the Countryside policies` considered whether creating a new policy was necessary given the existing policies CS14 and CS19 in the Core Strategy. Overall, it was considered that a new policy would consider the impacts in a rural context on the landscape and to achieving new development and redevelopment in harmony with the local character.

However, achieving good design is highlighted in National Planning Policy Framework (NPPF) paragraph 56 and is seen as a key facet of sustainable development which should concentrate on overall scale, density, massing, height, landscape, layout, materials and access. Design issues are covered extensively in Core Strategy policies CS14 and 19 and a review of the position and the comments received, it is considered that the existing guidance will cover the impacts in the rural area sufficiently. The issue of potential cumulative impact of development in the countryside is proposed to be added to Policy 1 as it is closely related to the level of new development in the countryside area, including the AONB. At officer level, it was therefore proposed to delete Policy 3, but Council Members requested that it be reinstated to provide the countryside context.

2. Supporting Evidence required to support planning applications

- There should be an emphasis on matching materials with neighbouring properties.
- Supporting evidence should include information on telecommunications infrastructure
- Design and its impacts on the environment are not explained in the supporting text and para 3.18vii should cover minimizing adverse impacts on the environment
- Should cover provision of detailed and evaluated reports on the biodiversity existing on the site (habitat and species), potential adverse impacts and

measures to avoid or mitigate adverse impacts. Should be a reference to securing biodiversity enhancements

- Architectural character should be separate from landscape character.
- Para 3.18vi should refer to use of materials and detailing acceptable in the local architectural context
- Should create a pallet of materials to be used in new development as part of a new design guide across the district.

Council response:

National planning guidance does not seek to impose particular styles but rather to reinforce local distinctiveness. This is covered by existing Policy CS14.

Landscape character and achieving high quality design are considered to be adequately dealt with by Policy CS14. A detailed design guide across the district is not planned within the Local Development Scheme because the Quality Design SPD is considered to fulfill this role.

Telecommunications infrastructure is covered by Core Strategy policy CS5. The conservation of biodiversity and the need to avoid impacts on protected species and seek enhancements to biodiversity are covered in Core Strategy Policy CS 17.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 4 Conversion of Existing Redundant Buildings to Residential Use

1. Policy 4 is inconsistent with national policy guidance

Consultation comments:

- It is not the most appropriate strategy when considered against reasonable alternatives. Normally changes of use to residential use would be approved.
- Criteria requiring the building to be suitable/appropriate for conversion is inconsistent with national policy and should be removed
- Requiring that the building is genuinely redundant is inconsistent with National Planning Policy Framework (NPPF):
- Should make reference to the exception of the AONB

Council response:

The Sustainability Appraisal addendum for Housing in the Countryside policies considered whether the creation of a new policy was necessary given the existing policies in the Core Strategy. Overall, it was considered that a new policy would give emphasis to the West Berkshire context, could draw attention to the permitted development rights and give guidance on accommodating development impacts on the landscape in a rural context and local character. It is considered that Policy 4 is an appropriate approach.

The overall strategy for distributing residential development in the council area is covered by Core Strategy policies CS1 and ADPP1. Policy ADPP1 identifies that only limited development will be allowed in the countryside, focused on addressing identified needs and maintaining the rural economy. As the Council has a five year supply of housing sites, this approach is considered to be consistent with the NPPF. Para 55 in the NPPF also makes clear that isolated new homes in the countryside should be avoided unless it meets one of the special circumstances set out in the guidance. One of the special circumstances identified is where it would re-use a redundant or disused building and lead to an enhancement of the immediate setting. The approach taken in Policy 4 is considered to be consistent with this guidance except that it does not currently make reference to enhancement of the immediate setting. It is proposed to amend Policy 4 to address this.

The NPPF makes reference to 'redundant' buildings but does not define this in its glossary, leaving it for the council to provide a definition. The supporting text to Policy 4 explains why it is necessary to show that a building is redundant. It is to prevent buildings which are performing an important function in the countryside from being converted to residential and then followed by a replacement building being sought to fulfil the function of the original building. This would work against sustainable development and the intention of the NPPF of avoiding new isolated homes in the countryside.

If the building to be converted requires extensive rebuilding, extensions or alterations, it is not likely to be a suitable building for conversion. Major changes to a building that has become integrated into the countryside setting would increase the impact of development in a location where development would not otherwise be permitted, running counter to the NPPF objective of providing an enhancement to the immediate setting.

A balance needs to be struck between converting redundant buildings and the conservation of landscape and scenic beauty in an AONB. Such development is not prevented by the NPPF but consideration of the impact on the conservation of landscape and scenic beauty has a greater weight. The principles in Core Strategy policy CS19 would also need to be taken into account in considering any proposals of this type.

2. Additional policy criteria

Consultation comments:

- Additional criteria are needed to restrict development in areas remote from public services and have poor overall sustainability
- Policy should recognise that conversion can improve the appearance and impact on the AONB and that this should weigh in its favour
- Does not cover provisions of saved policy ENV.20
- Conversion to residential development should be opposed
- Where the proposal is to completely replace the building it should be treated as new development in the countryside.
- Protect against buildings being given permission to convert to residential and then new agricultural buildings being sought
- Gardens of new residential properties could be used to intensify residential development in future years
- Proposals should seek to retain any historical character and significant architectural or historic features
- Light pollution should be included
- Should have regard to flood risk
- The criteria listed are too vague

Council response:

It is likely that some buildings will not be suitable for conversion to a residential use. For example, this may be due to an unsuitable location or the condition of an existing building. A reference to possible types of unsuitable conversions will be added to para 3.14 to make it clear that not all existing buildings can be converted to a residential use.

The Policy should always be read in conjunction with the other policies in the Local Plan. For example, Policy CS19 covers the protection of historic and landscape character assets and the criteria listed need to be taken into account in this case. However, many buildings suitable for conversion could have historic or architectural

features or local character and it is considered appropriate that an additional criterion should be added to the policy to reflect the desire to retain these.

It is proposed to add a requirement to the policy for proposals to enhance the immediate setting to ensure consistency with the NPPF paragraph 55. It is relevant for all proposals not just those in the AONB and supports the resistance of inappropriate intensification of uses.

Protection is given in the policy to take account of subsequent requests for replacement buildings once a building has undergone conversion. Light pollution would be taken into account under Core Strategy Policy ADPP5. The impact on flood risk would be a normal requirement in relation to a planning application and Core Strategy Policy CS 16 sets out the relevant criteria.

3. Supporting Evidence changes to amplify policy

Consultation comments:

- Redundant agricultural buildings often provide important habitats for legally protected species. Amend para 3.25 to include provision of documents to ensure adverse impacts on biodiversity are avoided or mitigated and make clear that net gains for biodiversity are sought.
- Paragraph 3.25 an additional requirement should be for retention of any historic character or significant architectural or historic feature
- Requirement to assess for flood risk should be highlighted in the text on prior notifications.
- Paragraph 3.24 should refer to the negative effects of light pollution

Council response:

Redundant buildings can often harbour a range of species. Therefore, it is proposed to add a criterion to the policy to include a reference to identifying potential impacts on protected species, providing appropriate mitigation and to the retention of heritage assets.

It is proposed to add a reference to paragraph 3.18 on the need to take light pollution into account. On prior notification schemes, the Council would request details of the scheme including flood risk. It is not considered necessary to add a specific reference to flood risk when no other examples of the details that might be requested are outlined in the text.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 5 Housing related to Agricultural and Forestry Development

1. Policy 5 is inconsistent with national policy guidance:

Consultation comments:

- It is not the most appropriate strategy when considered against reasonable alternatives. The policy does not provide an adequate explanation of the policy on supporting a prosperous rural economy role in supporting sustainable growth.
- Concern that the policy contains a presumption in favour of development

Council response:

The Sustainability Appraisal for housing in the countryside policies considered the alternative approach of retaining the saved policy ENV16. The approach of relying on the National Planning Policy Framework (NPPF) was rejected as it was considered that it did not provide enough detail for guiding decision making in West Berkshire. It was concluded overall that including a new policy had more positive sustainability effects than either relying on national planning guidance or retaining the existing saved policy.

The NPPF, paragraph 55, provides guidance on the special circumstances where isolated new dwellings in the countryside may be acceptable. One of these special circumstances is making provision for rural workers where they need to live permanently at or near their place of work in the countryside. Policy 5 seeks to provide criteria against which any planning applications would be assessed. The NPPF clearly indicates that this type of development is a special circumstance and it is therefore proposed to amend the policy wording to make this clearer.

2. Change to the supporting policy text:

Consultation comments:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

It is proposed to amend Policy 5 to cover all rural workers in the countryside, combining agricultural and forestry workers, together with other potential rural workers including those related to the racehorse and equestrian industry. In other words combine Policy 5, 6, 7 and 8. The supporting text to the policy will therefore be revised to include other examples of rural workers and reduce repetition between policies. The supporting text is proposed to be amended to include a reference to existing policies relating to biodiversity and the historic environment.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 6 Housing Related to the Equestrian and Racehorse Industry

1. Policy 6 is inconsistent with national policy guidance:

Consultation comments:

- It is not the most appropriate strategy when considered against the reasonable alternatives. The policy does not take account of national policy which does not support rural enterprises development to be temporary accommodation and to be time limited. If permanency can be demonstrated temporary accommodation is not consistent with policy.

Council response:

National Planning Policy Framework (NPPF) paragraph 55 seeks to promote sustainable development in the countryside through providing for essential rural workers needs to live permanently at or near their place of work in the countryside. It indicates that such housing provision is a special circumstance rather than a presumption in favour of development. The NPPF does emphasise the need to demonstrate why a rural worker needs to live permanently at or near their place of work in the countryside. However, it is how the council require the permanency of this need to be demonstrated. It is not unreasonable to have a period of time during which this permanency can be demonstrated to prevent abuse of the system leading to proliferation of dwellings in the countryside which were built to accommodate rural workers, the need for which was then not to be found to be permanent. Also, it is not unreasonable to seek to ensure that any housing provided in the countryside to support a rural enterprise is a viable going concern. Therefore, it is appropriate to seek confirmation that a business is viable and that where this is in doubt or yet to be established in the case of a new rural enterprise, for any accommodation to be temporary.

The Sustainability Appraisal considered alternative approaches and concluded that including a new policy could provide guidance on the impact of such development on the local character of the area, the wider landscape and provide information on the evidence required to prove the need for new housing and provide more positive sustainability effects than relying on national planning guidance or on Core Strategy policy CS12.

However, it is proposed to combine Policy 6 (and policies 7 and 8) together with Policy 5, so that all rural workers in the countryside are covered by a single policy e.g. to include agricultural and forestry workers, including those related to the racehorse and equestrian industry. The supporting text to the policy will be revised to reflect the changes to the policy. This approach will avoid the current repetition between policies 5, 6, 7 and 8 and improve clarity.

2. Changes to Policy 6

- Concern that policy contains a presumption in favour.
- New development in the AONB should be restricted as the general presumption in favour of sustainable development does not apply in such areas.
The policy is too permissive.
- The racehorse industry is seen as important in the district but is it necessary to extend the policy to all forms of horsiculture.
- New development in the AONB should be restricted. The presumption of sustainable development does not apply in such areas. The policy will lead to an unacceptable scale of housing development in unsustainable countryside locations.

Council response:

Core Strategy policy CS12 contains guidance on equestrian related development, its economic importance to the area and its role in the diversification of the rural economy. Equestrian related accommodation is covered by the term rural workers set out in NPPF paragraph 55. Both the policy and supporting evidence required for such proposals replicate that of Policy 5. It is therefore proposed to combine Policy 6 and Policy 5 including housing related to the equestrian and racehorse industry under the term rural workers. Supporting text relating to residential development for the equestrian and racehorse industry will be added to the Policy 5 supporting text.

The changes proposed to Policy 5 outline the specific circumstances where housing for rural workers could be permitted.

Guidance on new development proposed in the AONB is set out in Core Strategy Policy ADPP5 and focusses development in the most sustainable locations e.g. the rural service centres. The policy seeks to accommodate an appropriate level of growth in the area whilst balancing this with the protection of the important landscape quality. The provision in special circumstances for essential rural workers is considered to be consistent with the NPPF.

3. Supporting Evidence changes to amplify policy:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

The supporting text to the revised policy will be reviewed and amended to improve its clarity in explaining the new overall policy for rural workers. The changes proposed will include a reference to Core Strategy policies CS17 Biodiversity and Geodiversity and CS19 Historic Environment and Landscape character to illustrate how the issue of impacts on biodiversity will be addressed and how these can be avoided or mitigated.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 7 Housing related to Education Development in the Countryside

1. Policy 7 is inconsistent with national policy guidance

Consultation comments:

- It is not the most appropriate strategy when considered against the reasonable alternatives. The policy does not take account of national policy which does not support rural enterprises development to be temporary accommodation and to be time limited. If permanency can be demonstrated temporary accommodation is not consistent with policy.

Council response:

The Sustainability Appraisal tested the alternative approach of retaining existing saved policy ENV27. The adopted approach was found to provide better clarity on the provision of accommodation related to educational development. The National Planning Policy Framework (NPPF) makes provision for housing in the countryside to accommodate rural workers and sets out the circumstances in which this would be acceptable. The NPPF does emphasis the need for a rural worker to live permanently at or near their place of work in the countryside. However, it is how the council require the permanency of this need to be demonstrated. It is not unreasonable to have a period of time during which this permanency can be demonstrated to prevent abuse of the system leading to proliferation of dwellings in the countryside which were built to accommodate rural workers, the need for which was then not to be found to be permanent. In the interests of promoting sustainable development, it needs to be ensured that any housing provided in the countryside to support rural enterprise is a viable going concern. It is appropriate to seek confirmation that a business is viable and that where this is in doubt or yet to be established in the case of new rural enterprises, for any accommodation to be temporary.

The Sustainability Appraisal considered alternative approaches and concluded that including a new policy could provide guidance on the impact of housing related to educational development. However, the same benefit can be derived from the proposal to combine Policy 6 (and policies 7 and 8) together with Policy 5, so that it covers all rural workers in the countryside, including agricultural and forestry workers, those related to the racehorse and equestrian industry. It is considered unlikely that those working in rural schools would be able to demonstrate an essential need to live permanently at or near their place of work. However, any such case could be considered against this policy. The supporting text to the policy will be revised to reflect the changes to the policy. This approach will avoid the current repetition between policies 5, 6, 7 and 8 and improve clarity.

2. Changes to Policy 7

Consultation comments:

- Concern policy contains a presumption in favour.
- New development in the AONB should be restricted as the general presumption in favour of sustainable development does not apply in such areas and such development should only be permitted as an exception. Policy will lead to an unacceptable scale of housing development in unsustainable countryside locations.
- The policy is too permissive and development should only be permitted as an exception and be subject to a number of criteria.
- Bradfield College objects to the requirement for housing development only to be permitted where it can be proven to be essential to the continued use of the education facility. Schools and colleges would need to prove that without additional housing their facilities would fail.
- Para 3.42 should be deleted.

Council response:

The associated need for accommodation for educational workers could be covered by the term rural workers set out in NPPF paragraph 55. Both the policy and supporting evidence required for such proposals replicate that of Policy 5. It is therefore proposed to combine Policy 7 with Policy 5 to reduce repetition.

References relating to residential development for the educational establishments in the countryside will be added to the Policy 5 supporting text.

The changes proposed to Policy 5, address comments on the presumption in favour of development. The Core Strategy policy ADPP5 sets out detailed policy guidance on development within the North Wessex Downs Area of Outstanding Natural Beauty, focusing development in the most sustainable locations e.g. the rural service centres. The policy seeks to accommodate an appropriate level of growth in the area whilst balancing this with the protection of the important landscape quality. This approach is consistent with the NPPF.

The associated need for education related accommodation is covered by the term rural workers set out in NPPF paragraph 55, though it is considered unlikely that such workers would be able to demonstrate an essential need to live permanently at or near their place of work. These needs are likely to be met by the general housing provision in existing settlements. However, any such case that arises could be considered against this policy.

Both the policy and supporting evidence required for such proposals replicate that of Policy 5. It is therefore proposed to combine Policy 7 with Policy 5 (and policies 6 and 8). Relevant supporting text relating to residential development for education will be added to the Policy 5 supporting text.

3. Supporting Evidence changes to amplify policy

- The supporting text does not clearly explain the policy.

- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.
- Concern of the wording of paragraph 3.42

Council response:

The supporting text will be reviewed and amended to improve its clarity in explaining the policy. The changes proposed to supporting text will include a reference to Core Strategy policies CS17 Biodiversity and Geodiversity and CS19 Historic Environment and Landscape character to address the issue of impacts on biodiversity and how these can be avoided or mitigated.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 8 Housing Related to Medical, Social and Community Facilities

1. Policy 8 is inconsistent with National Policy Guidance and changes to Policy 8

Consultation comments:

- It is not the most appropriate strategy when considered against the reasonable alternatives. It is not national policy for residential development in support of rural enterprises to take the form of temporary accommodation and be time limited. The emphasis in national policy is on permanency.
- It is not consistent with the Core Strategy Policy ADDP1 or paragraph 4.17 in the Core Strategy or national planning guidance.
- It is unreasonable to require housing for such new uses to be temporary and time limited. This could have viability implications. The residential element should not be required to be located within a settlement divorced from the development.
- The reference to Policy 5 is unnecessary and should be deleted.
- The policy is too permissive and the presumption in favour of development should be removed and development should only be permitted as an exception and be subject to a number of criteria including the conservation of the landscape and scenic beauty of the AONB.
- New development in the AONB should be restricted as the general presumption in favour of sustainable development does not apply in such areas and such development should only be permitted as an exception.

Council response:

The Sustainability Appraisal tested the alternative approaches of retaining existing West Berkshire District Local Plan saved policy ENV27. It was concluded that including a new policy could cover local circumstances and heritage assets could be considered.

The National Planning Policy Framework (NPPF) provides for housing in the countryside to accommodate the needs of rural workers and sets out the circumstances where this would be acceptable. It emphasises the essential need for a rural worker to live permanently at or near their place of work in the countryside. However, the council need to define how the permanency of this need is be demonstrated. It is not unreasonable to have a period of time during which permanency can be demonstrated, to prevent abuse of the system leading to a proliferation of dwellings in the countryside which were built to accommodate rural workers, the need for which was then not to be found to be permanent. It is not unreasonable to seek to ensure that any housing provided in the countryside to support rural enterprise is a viable going concern. It is appropriate to seek

confirmation that a business is viable and that where this is in doubt or yet to be established in the case of new rural enterprises, for any accommodation to be temporary. The approach is considered to be consistent with the NPPF.

The policy approach to the AONB is set out in ADDP5 which focuses development within and restricts development in the open countryside to meet identified needs. This overall approach is consistent with the NPPF.

The need for accommodation for housing related to medical, social and community workers could be covered by the term rural workers set out in NPPF para 55. It is considered unlikely that those working in medical, social or community facilities would be able to demonstrate an essential need to live permanently at or near their place of work. Many of these needs are likely to be met by the general housing provision in existing settlements. However, any such case that arises could be considered against this policy.

Changes proposed to Policy 5 address the concern expressed on the presumption in favour of development.

2. Supporting Evidence changes to amplify policy:

Consultation comments:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

The supporting text will be reviewed and amended to improve its clarity in explaining the policy. The changes proposed to supporting text will include a reference to Core Strategy policies CS17 Biodiversity and Geodiversity to address the issue of impacts on biodiversity and how these can be avoided or mitigated.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 9 Extension of Existing Housing within the Countryside

1. Policy 9 is inconsistent with National Policy Guidance:

Consultation comments:

- It is not the most appropriate strategy when considered against the reasonable alternatives. The policy does not clearly indicate how the decision maker would react to a proposed extension to existing housing in the countryside. It should acknowledge householders who want to extend their properties can do so under permitted development rights.

Council response:

The Sustainability Appraisal tested the alternative approaches of retaining existing West Berkshire District Local Plan saved policy ENV24. It was concluded that preparing a new policy would enable the policy context to be brought up to date including references to permitted development rights. The National Planning Policy Framework (NPPF) does not provide detailed guidance relating to extensions to existing properties in the countryside, though it is clear about the importance of good design, the need to respond to local character and reflect the identity of local surroundings and materials. The presumption in favour of development applies though it clearly indicates that poor design should be refused. It is equally clear that great weight should be given to conserving landscape and scenic beauty in AONBs and conserving cultural heritage.

On balance, it is considered that to achieve good design in sensitive areas like the AONB and open countryside, Policy 9 would be strengthened and better clarity given to applicants if the criteria in para 3.49 were added to the policy. This would give a better indication of the range of considerations that need to be addressed when making a planning application.

2. Changes to Policy 9

Consultation comments:

- New development in the AONB should be restricted as the general presumption in favour of sustainable development does not apply in such areas and such development should only be permitted as an exception.
- The policy should not start with a presumption in favour of development.
- There should not be presumption in favour of curtilage extensions without looking at the history and cumulative impact.
- In areas of flood risk the footprint of a replacement dwelling should not be increased and opportunities to reduce flood risk impact should be incorporated.

- Should include a reference to ` heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance` .

Council response:

Core Strategy policies CS19 and ADPP5 provide detailed guidance for development in the countryside but a reference in the criteria which are proposed to be added to Policy 9 should include consideration of the impact on the setting within the wider landscape. The NPPF does not provide guidance on extensions to properties in the countryside and therefore the presumption in favour of sustainable development applies, subject to criteria to seek good design and minimising impact on the surroundings. There are also extensive Permitted Development Rights, which are referred to in the supporting text, and the policy considerations apply over and above this. Flood risk is considered under Policy CS16 and Policy CS 19 covers the consideration of historic interests so it is not proposed to amend the policy in relation to these issues.

3. Supporting Evidence changes to amplify policy:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

The supporting text has been revised to provide a clearer link to Policy 9. The protection of protected species and mitigation of impact of development is covered in Core Strategy policy CS17.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 10 Replacement of Existing Dwellings

1. Policy 10 is inconsistent with National Policy Guidance:

Consultation comments:

- It is not the most appropriate strategy when considered against the reasonable alternatives. The NPPF does not require a special policy on replacement dwellings in the AONB.

Council response:

The Sustainability Appraisal tested the alternative approaches of retaining existing West Berkshire District Local Plan saved policy ENV23. The National Planning Policy Framework (NPPF) does not provide guidance relating to replacement of dwellings in the countryside though it is clear about the importance of good design and the need to respond to local character and to reflect the identity of local surroundings and materials. It indicates that poor design should be refused. It is equally clear that great weight should be given to conserving landscape and scenic beauty in AONBs and cultural heritage. It is proposed to include the criteria in para 3.58 within policy 10. This would give a better indication of the range of considerations that need to be addressed when making a planning application.

2. Changes to Policy 10

Consultation comments:

- New development in the AONB should be restricted as the general presumption in favour of sustainable development does not apply in such areas
- The policy should not start with a presumption in favour of development.
- There should not be presumption in favour of curtilage extensions without looking at the history and cumulative impact.
- The policy should enable the potential for additional development on sites where there are existing dwellings
- The criteria in West Berkshire District Local Plan saved policy ENV23 should be included in the policy
- There is no reference to outbuildings

Council response:

Policy CS19 and ADPP5 provide detailed guidance for development in the countryside. The NPPF seeks to encourage sustainable development and this is reflected in those policies. The NPPF does not provide specific guidance on the replacement of existing dwellings. The replacement of existing buildings, together

with suitable guidance on design and consideration of the impact on the countryside is considered to be sustainable development.

The replacement of houses will be assessed on the basis of the impact of the new development relative to the existing property on the local character of the area and, within the AONB in particular, on its impact on the special qualities and natural beauty of the landscape. Additional permanent dwellings should not be created on the site of an existing dwelling in the countryside as this would undermine the general restraint on building in the countryside. Any replacement dwelling should be located on the footprint of the existing building but alternative siting could be considered if it has a positive benefit on the impact on the countryside or has other environmental benefits.

Policy 10 covers replacement dwellings. Where a replacement includes extensions to the existing building Policy 9 criteria will also be a relevant consideration particularly where it relates to adverse impacts on the setting, wider landscape and local character and amenity. Where a proposal includes considerations of outbuildings these will be considered against the criteria set out in the policy.

3. Supporting Evidence changes to amplify policy:

Consultation comments:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

The supporting text has been revised to provide a clearer link to Policy 10. Protected species and mitigation of impacts is covered by Core Strategy Policy CS17.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Policies to Guide Housing in the Countryside: Policy 11 Extension of Residential Curtilages

1. Policy 11 is inconsistent with National Policy Guidance:

Consultation comments:

It is not the most appropriate strategy when considered against the reasonable alternatives. The policy does not clearly indicate how the decision maker would react to an extension of a residential curtilage.

Council response:

The Sustainability Appraisal tested the alternative approach of retaining existing West Berkshire District Local Plan saved policy ENV22. It was concluded that including a new policy would minimise the harm to the countryside. It is proposed to include consideration of extending residential curtilages under Policies 9 and 10 as part of criteria based policies which will clarify how such proposals will be considered.

2. Changes to Policy 11

Consultation comments:

- There should be no presumption in favour of development in the AONB
- The policy should not start with a presumption in favour of development.
- Should not extend beyond the village envelope
- The policy does not take into account the potential cumulative impact of such change, particularly in the AONB
- Should include a reference to ` heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance`.
- To give greater protection to walkers an additional phrase should be added to give protection to Rights of Way and users of the countryside.

Council response:

The National Planning Policy Framework (NPPF) does not give specific guidance on extensions to curtilages in the countryside but refers to the need to recognise the character and beauty of the countryside and protect and enhance valued landscapes such as the AONB. The acceptability of such proposals will therefore depend upon the impact on the surroundings. The impact of each proposal will be considered individually as each will be expected to have no harm on the setting or wider landscape. National guidance makes clear that development within AONB's should be restricted and it is proposed to add additional text in the policy to ensure extensions consider the impact on the wider landscape. Rights of Way are protected under Core Strategy Policy CS18 and it is not proposed to duplicate this. Most of the

buildings being considered under this policy will be in the open countryside rather than within settlements with a defined boundary and each of these proposals will need to be considered individually in terms of its impact on the setting, the wider landscape, local character, and amenity. This will include the relationship with the settlement boundary where one exists.

3. Supporting Evidence changes to amplify policy:

Consultation comments:

- The supporting text does not clearly explain the policy.
- The supporting evidence requirements should include documents to show effective measures for how impacts on biodiversity are avoided or mitigated.

Council response:

The supporting text has been revised to provide a clearer link to the policy. Protected species and mitigation of any impact is covered by Core Strategy Policy CS17.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Residential Parking Policy for New Developments

Responses received: 9

1. The policy does not appear sound and there are not clear links between the evidence base and the resulting policy:

Consultation comments:

- The criteria defining the zones are vague;
- The results of the surveys do not seem to have been used in determining the number of parking spaces required;
- Reduction in parking for some dwellings is a concern (1 bedroom);
- Incorrect information being used in the evidence
- The whole policy needs to be revisited and clearly define the link between the surveys and the standards;
- Need for increased parking requirement overall to avoid future parking problems on new developments.

Council response:

The Council has used the available evidence base to help develop the policy, and create a zoning structure across a large and diverse area. This has meant the Council is trying to describe a number of different situations in a generalised way. The Council had considered a number of alternative ways of expressing the different zones, and the time taken to walk to services and amenities could be expressed as a range or an approximate time or something simpler could be used as a description. An alternative zoning structure has now been proposed for the District, based on the availability of key facilities and amenities within a community, rather than its designation within the settlement hierarchy.

The results of the parking surveys are just one aspect feeding into the proposed parking standards. A number of other factors have also been considered as outlined in the Background Topic Paper. Surveys in each location were undertaken on two occasions, once on a weekday evening (Tuesday or Wednesday) and one on a Sunday evening. The results shown in the Background Topic Paper are a combination of the visits. The background paper has also been updated to include a small number of additional surveys which have been undertaken since the publication of this policy. The outcomes of these surveys have also been used to finalise

There is a concern in the reduction from 1.5 to 1 space for 1 bedroom houses. In the existing policy, 1.5 spaces is an average to be achieved across the District for all dwelling types, so 1 bed units are likely to have been given permission with one parking space or even less (especially for developments of flats). Although there is a suggestion that the new policy seems to underestimate the requirements of residential developments, there is one significant difference being proposed which is

the exclusion of garages in the parking allocation. This should mean that the parking spaces provided in developments remain available for the parking of cars rather than being used for other purposes.

There was also concern that figures presented in the background paper did not match those from the 2011 census. These were not available at the time the original work. Some updating of the background paper has taken place to take account of this and other factors that may have changed. A sample of areas that were surveyed originally have been surveyed again to see if there have been any significant changes and this has fed into an updated Background Topic Paper.

2. The Policy has placed communities within zones upon which the proposed allocation is inappropriate

Consultation comments:

- Communities are have been incorrectly zoned;
- The lack of public transport in non-urban areas means smaller dwellings require additional parking spaces;
- There is a need for car parking to be increased for certain dwelling types, or additional thresholds be adopted;
- Parking spaces should not be permitted in tandem, with all vehicles having independent access.

Council response:

The Council used the designated Settlement Hierarchy to zone communities across the District. This may have meant that the edge of certain communities, which become more rural in character rather than its urban centre, have lower or limited public transport options. Upon review, the new zoning structure has moved away from zoning based on the settlement hierarchy (in most cases). However, most communities will experience some increase in the proposed parking allocation.

Where comments were received regarding the allocation of parking for smaller dwellings (e.g. one bedroom houses) the evidence base used showed that 1 bedroom properties do not generate 2 cars (in the norm), and therefore there is no evidence to support this proposal. This has been further reviewed, taking into account average vehicle ownership in rural and urban areas, which further disproved the need for the additional allocation.

The Council has considered adding additional thresholds for houses with more than four bedrooms, but taking into consideration the proportion of such properties within new development, the Council has adopted the inclusion of additional wording to ensure all dwellings which exceed the given property thresholds propose a provision of parking which is appropriate to its size.

Consideration was given to the request to prevent tandem parking within the curtilage of a dwelling. By allowing such, new developments risk minimizing or eliminating any potential greenery across the frontage of the property, to

accommodate additional parking, resulting in more driveways, and a prevalence of dropped kerbs. Therefore, tandem parking will continue to be allowed.

The measure of walking distance of up to 30 minutes to facilities and amenities is an unrealistic expectation for rural communities.

Consultation comments:

- Adults are unlikely to make a 1 hour return walk trip to access facilities within a modern and busy lifestyle, especially without access to public transport;

Council response:

This comment has been noted, and the proposal reassessed. As an outcome, the Council has removed all zones based on 15 and 30 minute walk to amenities and facilities. These have been replaced with a town centre zone, which comprises of a core town centre area plus a real-time five minute walk zone having been modeled by computer software. Any community with this town centre zone then has a uniform parking allocation outside of this five minute zone. Town centre zones have only been allocated to any community with a dedicated town centre with access to retail facilities and services, as well as good and frequent public transport services (e.g. rail or high frequency bus services). This has led to a fewer number of communities being allocated zones across the District. All other communities outside of these zones have a uniform parking allocation across the District.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Development Management Policies – Sandlesford Park

Responses received: 19

Below is a summary of all the issues raised through the consultation in topic areas. A Council response to these comments is set out at the end of the section.

Consultation comments:

1. General

- The metadata for this file should have been presented and considered much earlier.
- No amount of software modelling can replicate human nature, or predict the future.
- The A343 becomes grid locked as soon as there is a closure of the bypass.
- This revision of CS3 Sandlesford Policy is not required. The earlier version has already been considered sound and deliverable by the Inspector.
- This policy discussion should be in an SPD.
- The fact that this policy needs revising at all now strongly suggests that the adoption of the original version as *sound* was itself an error and a full review is required of the original CS3 adoption by the Inspector.
- The traffic flow document does not state how existing traffic will be affected. This is particularly pertinent at the Pinchington Lane Retail Park, which is already very busy.
- Warren Road is so short that development traffic risks being funnelled into a small area.
- We still do not know the impact of the 1500 homes on the racecourse.
- When we bought the house in May 2013 the proposal for an all vehicle access road was not on the table and if this was the case we wouldn't have bought the house.
- Negative impact on existing property values.
- Moving the entrance to Park House School would compound the negative issues.
- Neither the proposed changes to Policy CS3 of the Core Strategy in respect of means of access or an additional masterplanning task are justified and are not required.

2. Principle of Development

Location and Design:

- The impact on the mature trees in Warren Road and Park House School has not been considered.
- I understood that it was Government policy to protect school sports pitches. Why is West Berkshire Council going against Government policy?

- It would be an irreversible precedent if this huge estate was allowed to go ahead.
- Could the estate be subdivided so they are like old style roads rather than rat runs?
- We do not need more retail in Newbury.
- The potential new road layout of the site is discussed at great length. This is in contrast to the high level description with no prescription or options.
- North Newbury would be a better location for this development.
- A better distribution of housing would be for every village / town to take a percentage of houses equal to the population already there... such as 10% extra.
- WBC should determine and justify the maximum number of houses it can accommodate before embarking on negotiations with its neighbours.
- From the appearance of Warren Rd's surface, eastbound beyond the spur which leads to the church, the road would seem to be unadopted. If this is the case, we find it hard to understand how W. Berks can make such proposals.
- A road across the northern valley is essential to encourage traffic from within the development to use the A339 access.
- The new road layout will create a rat run.

3. Amenity

- Change of use causes concern that the use of this well used amenity may be lost as walkers/cyclists are discouraged by the traffic leading to the footpath.
- English Heritage welcomes the reference in paragraph 9.8 to the protection of the registered historic landscape and setting of the former Sandleford Priory.

4. Duty to Cooperate

- Hampshire County Council (HCC) is of the view that the district council is required to provide evidence of joint working on the identification of appropriate sustainable transport solutions, in particular related to the issue of traffic growth on the A339.
- More work needs to be carried out in relation to the transport infrastructure required for a major development at Sandleford.
- HCC would like to see this significant traffic increase on the B4640 mitigated.

5. Infrastructure

GP Surgery:

- There is NO high level discussion at all of health care provision.
- The surgery already has difficulty employing much needed doctors.
- The Surgery car park already overflows.

6. Highways and Transport

Highway Network/traffic/Access:

- The use of Warren Road for sustainable transport should be maintained.
- The provision of an all vehicle access onto Andover Road is more technically challenging than an access onto the A339.
- All vehicle access should be directed toward the A339 and AWAY from the high pedestrian area around Warren Road.
- Accesses serving the Falkland School and St Georges Church and halls would be onto or in very close proximity to the junction serving the development from Andover Road.
- Much on street car parking associated with Park House and Falkland Schools would be displaced by junction improvements.
- To reduce traffic levels on the A343 to the north of Warren Road, it may be preferable to prohibit traffic turning right from Warren Road onto the A343.
- The provision of a greater number of accesses would comply with the government publication Manual for Streets (MfS).
- It is a matter of common sense rather than science that the more access roads you provide, the less traffic each will carry, but that does not make it a valid solution.
- The use of Warren road as an all vehicle access route will not encourage more sustainable forms of transport.
- Impact on all other junctions along Warren Road.
- NO CONSTRUCTION TRAFFIC should be allowed to use Warren Road.
- Consider an access to the Sandleford site from the south, linking with Andover Road at some point between Wash Water and Smallridge.
- An exit by the Recycling Centre would be preferable, to one via Warren Road, but only by means of a new roundabout.
- The access changes proposed in the policy revision are themselves confused.
- The supporting documentation for access makes it clear that the only way the Warren Road access can be achieved is to take land from Park House School. However the schools provision document states that more land is required to accommodate the increase in pupil numbers.
- The proposed vehicle access link, onto the A339 close to the HWRC, could impact on the operation of the HWRC. Waste Management should be consulted on any future designs for this area.
- The Sandleford development has already been judged to be viable without needing an all vehicle access from Warren Road.
- Widening Warren Road to incorporate either buses only or cars and buses, either option would create a massive impact on an already bottlenecked area.
- It does not matter how you plan where the traffic enters or exits the development basically it all meets up on the same already congested roads, and not only at Peak times.
- Over development of New Greenham Park pushing more and more heavier vehicles into the area.
- Anyone trying to drive across Newbury after 10am has to use the 339 due to pedestrianisation and the closure of the Park Way bridge.
- Why is the size of the development and the number of houses not being revised / decreased rather than the infrastructure increased?

- Analysis needs to be performed on traffic levels during north bound and south bound closures of the A34.
- It is disingenuous to suggest that the consultation threw up a demand for full access to the development through Warren Road.
- If the development now needs at least three and ideally four full access points, it cannot have been deliverable with just two.
- The road network and services will not be able to cope with such an increase in population and cars.
- The main route in and out should be onto the A339 and/or the B4640 and at last resort onto Monks Lane.
- Nowhere within the traffic study is there any mention of the popular school / college 'ratrun' between the Andover Road and Monks Lane via Wendon Road / Chandos Road / Rupert Road. This is currently extremely busy, particularly during the am peak.
- On the assumption that the proposed new Warren Road junction is for no right turn onto the A343, then this traffic projection would imply that opening Warren Road would be our preferred option.
- What is the detail of how the traffic distribution modelling provided in Appendix F was conducted?
- If Warren Road is to be used for site access then traffic leaving the site should only be able to turn southwards. This junction would need careful consideration to reduce hazard for pedestrians, especially on the western side of the A343.
- Rear pedestrian access to Falkland Primary School should be maintained.

Road Safety

- Warren Road should not be used as an all vehicle access route, as it introduces unquantified traffic injury risk to users of several facilities in the vicinity, many of them children. The current road layout does not lend itself to a 20 mph layout required for safe permeability by pedestrians and cyclists.
- Traffic permitted along the Warren Road also flows into a high footfall area.
- The shops at Wash common and local garage will also attract additional footfall as the development grows.
- Using the A339 for access would be a safer choice.
- I am concerned that cost may prevail over safety and common sense when choosing which access route to use.
- Access via Warren Road is poor from an environmental and safety point of view.
- The West Berkshire child Killed and Significantly Injured (KSI) figures will rise significantly if Warren Road is made into an all vehicle access.
- Using the A339 access will reduce traffic flows near schools by 39%.
- Introduction of further traffic calming measures on the A343 would be of value.

7. Pollution

- It is understood that the pollution monitoring station at the A339 - St Johns Road / Queens Road junction is currently showing periods when pollution

exceeds recommended limits - this can only get worse with the additional development traffic.

- Increase of traffic noise outside properties.
- If a pedestrian crossing is installed we will have additional noise from the beeps the crossing makes.

8. Education

- Clere School should be dragged up to a higher standard rather than forcing an enlargement on a very successful one?
- The traffic generated by new junior schools would not be manageable.
- Where would the land to extend Park House School come from?
- With the pressure on primary places the new schools will inevitably pull in pupils from around Newbury, increasing pressure on local infrastructure.
- Support is given to the separate development of Childrens Centre, Pre-School, Primary and Secondary provision there is much to be gained from their effective co-ordination, both geographically on the site and during their development.
- There needs to be a clear plan for transitional education arrangements as the site develops over what may be an extended period to reach the full quota of 2000 homes.
- Children, living on the Sandleford Estate, will create increased traffic levels when attending schools, other than Park House.
- There is an inconsistency in the manner the scale of education is prescribed when the housing component of the policy is expressed as up to 2,000 new homes. An element of flexibility in the expression of this infrastructure requirement is required.

Council response:

Land at Sandleford Park, on the southern edge of Newbury, was allocated through the West Berkshire Core Strategy as a strategic site for up to 2,000 dwellings, 1,000 of which are due to be delivered within the Core Strategy period to 2026. The site will help to meet West Berkshire's housing requirement to 2026 of 10,500 dwellings and will also provide education facilities, community uses and public open space including a Country Parkland.

Policy CS3 of the adopted Core Strategy sets out the parameters to guide the development of this site.

A revised policy to guide the future development of Sandleford Park was proposed at the preferred options stage of the preparation of the Housing Site Allocations DPD to include a requirement for a Masterplan for the whole site. This was something that was always envisaged, given that the site was promoted as a single site throughout the allocation and examination process. However, as it was not set out in the policy or the adopted SPD, the policy was revised to confirm the requirement in order to set out the Council's expectations for delivering the site comprehensively.

Other revisions to the policy reflected available information on revised infrastructure requirements for the site including accesses to the site and educational requirements.

A planning application for the Sandlesford Park site was envisaged earlier in 2015 and the DPD was not progressing to a timetable that would enable a revised policy for the site to be at an advanced enough stage to form a framework to help to determine the planning application. An alternative approach was therefore taken forward. Following legal advice, it was decided that the aims of the Council could be achieved by amending the adopted Supplementary Planning Document (SPD) for the site rather than amending Policy CS3. Amending the SPD in the way proposed was considered consistent with Policy CS3 and was able to be progressed to a faster timetable than the SPD. A revised SPD for Sandlesford Park was adopted by Council in March 2015. The draft revised SPD was subject to a seven week period of consultation, and the adopted SPD is accompanied by a Statement of Consultation that sets out all of the comments received and shows how they have been taken into account.

A new primary purpose for the SPD is set out which is for the SPD to assist in the delivery of a comprehensive and sustainable development across the site as a whole. This is underlain by the requirement for a single planning application which is set out as a new development principle – S1. This explains the benefits of a single application for the site which will ensure a holistic and comprehensive development across the site as a whole which maximises the potential of Sandlesford Park as a well-planned, cohesive and sustainable urban extension.

A single application will also enable the development to be properly assessed as a whole to ensure that it achieves the vision and objectives set out in the policy and the SPD. This will enable the required infrastructure to be properly planned and delivered in an integrated and timely way across the site. A single application will also enable the infrastructure requirements to be assessed accurately by the Council Service Units, with details about where it will be situated and how the delivery will be timed.

It will also ensure that the site is designed as a whole in a cohesive manner.

Other amendments to the SPD reflect the requirement for a comprehensive development to be delivered through a single planning application, and more detail on this has also been added to the delivery and implementation section (section G) of the SPD.

An SPD is a material consideration in the decision making process and any developer would therefore need to show sound reasons for not complying with any of its requirements.

As the revised SPD has been adopted by the Council there is therefore no longer a requirement to revise policy CS3 through the Housing Site Allocations DPD. The proposed amendments to the policy have not, therefore been taken forward. The detailed points submitted during the preferred options consultation are not, therefore, responded to as an alternative approach has been taken forward.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Chapter 3 Housing Site allocation – Newbury and Thatcham Spatial Area

Responses received: 3

Consultation comments

- The Core Strategy and Housing Site Allocations DPDs do not specifically identify the proportion of growth/ specific number of dwellings proposed to be delivered at the Service Villages, or the distribution across these settlements. Cold Ash scored favourably within the Settlement Hierarchy Topic Paper. Unlike the majority of the villages, it is not situated within the AONB and is the only Service Village within the Newbury and Thatcham Spatial Area, which is proposed to accommodate the majority of growth. The allocation of smaller extensions to the settlements will assist with supporting the vitality of the area. We also note the recent creation of a flood alleviation pond to the south of Cold Ash, increasing its suitability to accommodate future development.
- Objection to document due to the lack of clarification and confusion of the content of Section 3 Housing Site Allocations – Newbury and Thatcham Spatial Area.
- It states in **Section 3.1** that the spatial area includes Greenham, Enborne, Shaw-cum Donnington and parts of Speen and Cold Ash. This needs to be clarified in far more detail. It is far too vague with respect of the actual areas it covers.
- **Section 3.2** This paragraph needs to be more clearly written as it affords confusion. It states that a core strategy requirement of 6300 houses is for the spatial area as of March 2013, some 17 Months prior to the DPD being issued for consultation (July 2014) surely this should have been considered before the DPD was conceived.
- No update on the numbers of houses under construction or allocated for development have been issued since March 2013 to give an accurate number of what houses are required, yet it gives a figure of 1100 houses required. Is this Figure for the whole of the Spatial Area?
- **Section 3.3** refers to an urban village but makes no reference to the number of homes this would provide has this mysterious figure been subtracted from the Core strategy requirement?
- **Section 3.4** States that a Core Strategy requirement for Thatcham is 900 houses, then continues to state that 800 have already been completed or are under planning permission. Why has Thatcham been separated from the Original Core strategy Spatial Area?
- **Section 3.5** Why has Newbury been separated from the original Core Strategy Spatial Area?
- According to the area maps issued within this document for the Newbury Thatcham Spatial Area there are a total of 50 shortlisted sites.
- Within this document it also gives reasons as to why this figure was reduced from 50 to 11 preferred sites, but the key reasons for rejection of these 39 sites are a

contradiction, in so much that planning permission has been given to sites within this spatial area that would contradict these key reasons stated. Therefore request that the preferred options consultation document be withdrawn.

- Newbury should be the focus of housing growth, was relatively unaffected by the recession, yet had an accumulated shortfall of 638 dwellings at March 2013. The under-delivery in Newbury was caused by delays in planning and the Council's failure to allocate sufficient land in a timely manner. During the plan period the need for affordable housing has significantly increased (The Housing Needs Assessment showed an additional 746 affordable homes each year to address current and arising housing need across the District).
- The DPD will repeat rather than learn from mistakes of the past through failure to allocate an adequate supply of sites that can be delivered in the short term. Will fail to deliver sufficient new homes to meet the OAN and current backlog will continue to increase. The SADDPD Preferred Options allocates land to accommodate around 360 dwellings at Newbury, or 35% of the residual Core Strategy requirement (13% if a 20% contingency is to be provided). The Council therefore relies on the majority being provided from un-allocated sources; an unreliable land supply that will stifle house-building in the short term

Council response:

Comment on Cold Ash noted. The village is, however, adjacent to the AONB and has limited development opportunities.

The spatial area contains the parishes of Newbury, Thatcham, Greenham, Enborne, Shaw-cum Donnington and parts of Speen and Cold Ash (those parts not within the AONB). Consideration will be given as to how the spatial areas can be shown more clearly on the Policies Map.

The document states that the requirement is for approximately 6,300 new homes between 2006 and 2026, not at March 2013. The figures for 2013 were the latest available at the time of the preferred options consultation. Updated figures will be used for the Draft Submission Version of the DPD.

The situation with regard to housing completions and permissions has been updated in the Council's Annual Monitoring Report (AMR) which is published on the Council's website. The figure of 1,100 in paragraph 3.2 referred to the spatial area.

The precise number of dwellings to be developed at the Market Street "urban village" is yet to be determined, but is likely to be at least 200. There has been a recent community planning event and an application is expected towards the end of 2015. The Market Street development will be included in the figure of identified sites which contribute to the housing supply.

The requirement of approximately 900 homes for Thatcham is over the Core Strategy plan period from 2006 -2026. At March 2013 over 800 had either been completed or had planning permission.

Newbury and Thatcham are not separated from the spatial area; they are the main settlements that make up the spatial area. The Core Strategy contained policies to

guide development in both settlements which included an approximate number of dwellings to be accommodated over the plan period.

The potential sites were selected following assessment of the evidence, including sustainability appraisal of sites. Sites which have been granted planning permission would have been considered on their merits and would have been determined according to the Development Plan unless material considerations indicated otherwise.

The Council cannot withdraw the consultation document. The whole point of consultation is that people have an opportunity to make their views heard and for the Council to take these into consideration in drawing up the Proposed Submission Version of the DPD.

Newbury is the focus for housing growth. Current strategic allocations in the Core Strategy are both located in Newbury; the Racecourse site for up to 1,500 dwellings and Sandleford Park for up to 2,000 dwellings. The Housing Site Allocations DPD seeks to allocate additional smaller sites that will deliver in the short term. It is misleading to say that only 35% of the residual requirement is allocated and that the reliance for the majority of the requirement is from un-allocated and unreliable sources. With approximately 500 dwellings to be allocated in the Newbury/Thatcham area through the Housing Site Allocations DPD, the allocations in this spatial area for the plan period amount to approximately 3,000 dwellings or almost half of the total requirement, with up to 1,000 additional dwellings to be delivered from Sandleford Park in the period after 2026. Delivery was always anticipated to be lower at the start of the plan period as there will be some delay in bringing forward the larger sites. Delivery is now progressing well on the Racecourse site and the Council anticipate a planning application for Sandleford Park in the very near future. There is only a small number of identified sites included within the supply and the windfall allowance is only included for the first 5 years, based on past trends of permissions and delivery rates. The Draft Submission DPD will ensure that there are sufficient sites to meet the Core Strategy requirement.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW012: Land north of Newbury College, Newbury

1. Development Potential

Consultation comments:

- The site includes the Marston's pub site
 - Planning application submitted (14/01649/FULD) (*approved after the consultation and pub under construction*)
 - Agree that the site is suitable for residential development however, would like the site to be considered for alternative uses to housing, therefore, request that a lower number than 23 dwellings are proposed for the site to allow for alternative uses on the site
- Greenham has already been allocated the vast majority of the Council's housing target
- Not adequate consideration of brownfield sites in Newbury – Sterling Cables, LRIE – development of these would eliminate the need for this site
- Use of less environmentally sensitive sites

Council response:

A revised site area has been submitted by the site promoter to take account of the Marston's pub site. The new site area has capacity for 10 – 15 dwellings. The site is being promoted for housing, rather than alternative uses.

It is noted that Greenham parish has received the two strategic allocations through the Core Strategy. The Council are only able to consider land that is submitted to them through the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA includes brownfield sites that the Council are aware of, and where these are suitable for development they have been included in the calculation for the remaining housing requirement for the DPD. The Preferred Options DPD set out the Council's approach to London Road Industrial Estate as area for future allocation. The LRIE site is within the settlement boundary and sites such as these are not generally allocated. It is also contrary to current planning policy and therefore not deliverable at this stage. Sterling Cables has been granted planning permission for residential development and is therefore included in the housing figures as a commitment.

All sites have been subject to Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which looks at the environmental, economic and social sustainability of the sites on a consistent basis. Where a site is highlighted as having

a potentially significant negative impact the site has not been put forward for allocation.

2. Consultation process

Consultation comments:

- Inadequate consultation - carried out during summer holidays, communication of the consultation and deadline have been inadequate

Council response

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

3. Ecology

Consultation comments:

- Impact on biodiversity
- The site is in close proximity to ancient woodland and or a Local wildlife Site – potential for harm to be caused by development itself, or indirectly by additional use of the site. Mitigation measures or impact avoidance measures would be required
- Natural England concerned regarding the Impact on Greenham and Crookham Commons SSSI – the sites fall in the Impact Risk Zone. Impact need to be assessed and justification given.

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options. No concerns have been raised with this site.

The site is not adjacent to ancient woodland or a Local Wildlife Site. Mitigation measures to protect the Ancient Woodland and LWS will be put in place as part of the Sandleford Park development.

The site is within easy walking distance of the Sandleford Park country parkland, which should help to reduce the pressure on Greenham Common.

Additional consultation with Natural England has clarified that they do not have concerns over development of this site.

4. Highways and transport

Consultation comments:

- Incremental increase in traffic
- Proximity to Greenham Common, but unlikely to walk/cycle increasing car use
- The site is acceptable in terms of public transport. The Transport Services team have an aspiration to provide a more even 30min frequency (or better) service in this area

Council response:

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion. A Transport Statement would be required to accompany a planning application for the site, which would look at the impact of the development on the local road network and suggest mitigation measures that may be required. A simple Travel Plan, setting out measures to encourage alternative modes of travel to the car would also need to be provided.

The site is quite close to Greenham Common; however, it will be within easy walking distance of the Sandleford County parkland, which should help to reduce the pressure on Greenham Common.

The development of Sandleford Park will further improve the public transport provision in this area.

5. Historical Environment

Consultation comments:

- The site is opposite the grade II listed Monks Lane Filling Station – development is not considered to adversely affect the setting/significance of the listed building
- Some evidence of Romano-British activity and the need for further assessment as set out in the SA/SEA is noted – if this is not to be carried out prior to submission of the DPD this should be a requirement of the DPD in accordance with Para 128 of the NPPF

Council response

It is noted that the development of the site is not considered to adversely affect the setting of the grade II listed Monks Lane Filling Station. Any potential impacts would be considered at planning application stage. An archaeological desk based assessment would be required as part of a policy to guide the future development of the site.

6. Infrastructure

Consultation comments:

- Local infrastructure is struggling to cope
- The infrastructure proposed for Sandleford Park (adjacent to the site) is already considered to be inadequate
- Significant impact on infrastructure/amenities

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to

serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

The required infrastructure for Sandleford Park is set out in the IDP with further details in the Supplementary Planning Document.

7. Landscape/Setting

Consultation comments:

- Change in open character of the area around the college

Council response:

It is noted that development in the area will change the character of the area. However, the site would be sensitively designed to enhance the gateway into Newbury from the south, and would require appropriate landscaping as part of any proposal.

8. Comments from site promoter

- Support allocation of the site
- Would complement the college facilities and the wider Sandleford Park allocation

Council response

Support for the allocation of the site is noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW042: Bath Road, Speen

Responses received: 76

1. General

Consultation comments

- Concerns over the security of properties
- Impact on property value of surrounding housing

Council response

All development will be designed to create safe environments, addressing crime prevention and community safety.

The impact on property values is not a planning issue, and therefore, is not taken into consideration.

2. Infilling between Speen and Bypass

Consultation comments:

- The development is considered infilling, something which was promised as unacceptable when the bypass was built
- Fear that this infill development will set a precedent for other infill developments up to the bypass

Council response

In planning terms, in principle the site is in a potentially suitable location for development, taking into account the technical evidence base and the outcomes of the SA/SEA process.

3. Character of area/district

Consultation comments:

- Proposed development out of character with existing housing and the period village community
- Development may distract from Newbury as a rural, market town
- Want to maintain character and community as Speen as a village, although included with the urban area of Newbury
- The development will be out of keeping with the immediate vicinity of large houses with generous gardens - As identified in CS19 this is a key issue in West Berkshire

- Development seems not to have now used or considered the guidance outlined in the 2001 Speen Village design statement

Council response

The Council need to allocate enough sites to meet the requirement set out in the Core Strategy. Sensitive design to ensure no impact on the immediate local or wider environment is key and considered at planning application stage. The principle of development is being assessed at this site taking into account technical evidence base and the outcomes of the SA/SEA process.

Sensitive design is vital; development needs to take into account the character of the existing residential development, including density and design. Development will need to comply with policy CS19 of the Core Strategy.

As yet no detailed designs have been drawn up for the site, this level of detail would be considered at planning application stage where the village design statement is a material consideration.

4. Proposals for other potential sites

Consultation comments

- It has been proposed that brownfield sites should be reassessed to allow NEW042 a fairer assessment in comparison to others
- Land at Tull Way is better related to the centre of Newbury than this site
- Land further outside of Newbury should be considered as 44% of the district population are already rural and this is a significant attraction of living in the district
- The road frontage onto Station Road should be considered for a small number of houses (4 suggested) and the loss to the allotments is compensated with an extension to the westerly direction
- Other brown field sites including the London Road industrial estate
- NEW031 A/B should be developed

Council response

All sites have been assessed on a consistent basis. The SA/SEA considers the outline of the site only and the impact that any development on the site could have on sustainability. Where a site promoter has provided additional information this is taken into account in the mitigation section, as there is no guarantee at this stage that the proposals set out now will come to fruition.

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area. London Road Industrial Estate is within a protected employment area, and therefore, development on the site of residential development is currently contrary to

CS9 of the Core Strategy. The preferred options DPD states that consideration will be given to the future of the site through the new Local Plan.

The site “land at Tull Way” is within the settlement boundary where there is a presumption in favour of development (subject to other policy issues); therefore, the Council do not need to allocate the site.

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy. While other sites may be being promoted, their allocation would be contrary to the spatial strategy of the Core Strategy.

Development of NEW031A/B was not taken forward at the preferred options stage due to the outcomes of the SA/SEA and the technical evidence base.

5. Ecology

Consultation comments

- Proximity to nationally important ancient woodland and/or local wildlife sites could see habitats suffer direct loss
- Development is within 2km of the River Lambourn SSSI/SAC and there is concerns over these areas, as the area is within 2km the development should include Sustainable Drainage Systems (SUDS)
- Site is a valuable green corridor for wildlife including protected newts
- The need to infill the reservoir would change the landscape of the site and a survey for the great crested newts would need to be undertaken

Council response

The Council’s ecologist has been consulted on all sites put forward through the Preferred Options DPD. No concerns have been raised regarding this site, however, an Extended Phase 1 Habitat Survey would be required at planning application stage and this is included within the policy for the site.

The site is not adjacent to ancient woodland, or a local wildlife site (LWS). It is acknowledged that Benham Park and Speen Moor LWS is to the south of the site, but it is not considered that development would have a significant impact on the LWS.

A significant amount of public open space is proposed to be included on the site which will help to reduce the impact on local wildlife, as well as help to provide SUDs. SUDs are required on all sites, ideally to reduce runoff rates to Greenfield level.

The landscape assessment carried out on the site states that the area of the site with the reservoir would not be acceptable for development. The developable area of the site has been updated to reflect this.

6. Flooding

Consultation comments

- Site appears to be in a flood zone
- Change in local draining could result in increased flooding in an area that is already subject to regular flooding due to nearby streams and natural springs
- Hard flood defences can be environmentally harmful

Council response

The site is in flood zone 1, which is the lowest level of flood risk. A Flood Risk Assessment would be required as the site is over 1ha in size. This would need to consider all sources of flooding, including groundwater and surface water. Sustainable urban drainage systems would need to be provided to ensure development would not have a risk on flooding downstream of the site.

7. Heritage

Consultation comments

- Development documents indicate site is adjacent to Speen conservation area whereas the West Berkshire website indicates the allotment area is part of the conservation area
- Proximity to Speen Conservation Area means a sensitive design is required
- Site overlooked by Donnington Castle
- Site of the Second Battle of Newbury
- One of the Battle of Newbury sites is already of the “Heritage at risk” lists and with the proposed development it is believed this site could join it
- Current allotments are situated on the site of a roman road
- Site NEW042 is a suspected site of the second battle of Newbury and is within a conservation area, both reasons for the rejection of NEW010, NEW001 and NEW040

Council response

It is noted that the allotments are included within the conservation area. The allotments are no longer proposed to be included within the developable area of the site; they will be retained in situ. Sensitive design would be required in line with policy CS19 of the core Strategy, to ensure no negative impact on the conservation area. A heritage impact assessment would be required to accompany any planning application on the site.

While the second battle of Newbury site is not an officially designated heritage site, it is of potentially significant historical interest. The Heritage Impact Assessment would determine the archaeological value of the site.

The heritage status of a site is only one factor considered, there are a number of other reasons that NEW010 (flooding), NEW001 (flooding) and NEW040 (topography) have been rejected.

8. Highways and transport

Consultation comments:

- Disagreement with the statement that only 10% of traffic from the development will be within peak times due to the lack of schools and employment nearby
- Single access road from the A4 inadequate and potentially dangerous during a safety incident with emergency vehicles limited to one access route
- The A4 roundabout with the A34 is an accident 'hotspot'
- Turning onto the A4 during peak times will be tricky and dangerous (can be travelling fast and braking just before the speed cameras)
- Poor sightlines from Station road and the hill start make this road already dangerous
- Potentially could limit access to The Sydings
- It is believed increased congestion could mean other smaller roads will become the "rat-runs" for traffic
- Access to the A4 (via station road) at Speen is already congested and the proposed housing could increase this, impacting on child safety and the use of station road as an access route
- Increasing traffic accessing the Robin Hood roundabout/centre of Newbury
- Speen Lane potentially unsuitable for increased traffic due to limited pavement and street lighting coupled with narrow stretches, driveways blind to the road and uneven ironworks
- Potentially limiting access to the site via a left turn would reduce congestion
- Castle view development has been extended by 50 rooms also adding to the congestion

Council response

The approximate vehicle movements give the number of movements per day (both in and out of a proposed development), and then an indication of the movements between 8 and 9am. The figures are worked out using information from the TRICS database, a UK wide database of traffic survey data from a range of land uses including residential. Therefore, they are considered an appropriate estimate of daily/peak time traffic movements. The site is 1km from the nearest primary school, with Newbury town centre approximately 2km which is easily within the acceptable walking distances set by CIHT (2000), which gives commuting and travel to school a maximum distance of 2km.

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of all the preferred options sites (in combination) would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there would be a limited impact on local congestion. Background traffic

growth is shown to have more of an impact on the highway network than development of the preferred options sites. A Transport Statement/Assessment would be required to accompany a planning application for the site, which would look at the impact of the development on the local road network and suggest mitigation measures that may be required. A Travel Plan, setting out measures to encourage alternative modes of travel to the car would also need to be provided.

Public Transport

Consultation comments

- Number 4 bus service every two hours (with a four hour gap in the afternoon) is not regular enough. The service would need to be at least every 60 minutes.

Council response

The site is within walking and cycling distance of the town centre, where there are a number of bus routes, and a railway station. Increased population can help to improve bus services, details of this would be discussed at planning application stage.

Walking/cycling

Consultation comments

- The site is potentially not walking distance (about 40 minutes) of the town centre for most people and the walk would be dangerous when attempted (limited pavements and residence would need to cross the A4)
- Pavements in Speen are narrow and limited, putting people at risk

Council response

The site is considered to be within walking distance of the town centre for commuting or travel to school (set at 2km by CIHT, 2000). Transport Assessment work carried out at the planning application stage would consider what improvements could be made to the highway network to improve road safety.

It is noted that the pavements in Speen are narrow and limited in places.

9. Infrastructure

Consultation comments

- Lack of local shops and other local amenities in Speen (a single pub and one recreation ground, no shops), this will potentially result in increased traffic
- The need for housing is appreciated and if problems were overcome a smaller development may be acceptable

Council response

The site is close to Newbury Town Centre, where there are a range of services and facilities.

Existing pressure on some local services and facilities is recognized. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Medical Facilities

Consultation comments

- Already difficult to get an appointment at the doctors, with both the nearest surgeries (St Mary's Road and Northcroft) struggling to accommodate patients

Council response

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP). St Mary's Road and Northcroft surgeries are moving to Strawberry Hill, which will provide new facilities and additional capacity.

Education

Consultation comments

- Lack of vacancies at local infant/junior schools, it is believed that Stockcross School is already oversubscribed

Council response

Consultation with the Local Education Authority has indicated that there is a suitable education solution for the area.

Leisure Facilities

Consultation comments

- The recreation site off Station Road is in regular use, increased traffic would be a health and safety risk, especially during crossing
- Field is popular with walkers, with a number of popular footpaths and thus the development would reduce access to open countryside
- Rights of way include the Lambourn Valley Way, one of the National Trails of the UK
- Speen residence would have a reduction in accessible green space leading to a possible decline in health and welfare
- The site is also used for recreation by children, as this means they can avoid crossing the A4

Council response

Development of the site would result in a significant amount of public open space, which could include some formal recreation space. This would improve recreation facilities in the local area, and reduce the need for people to drive to access such facilities.

The concept plan provided as part of the promotion of the site shows the Lambourn Valley Way as a public right of way. Development of the site would result in a new set of footpaths and routes across the site, improving the links to the countryside.

Utilities

Consultation comments

- Thames Water potentially need to provide new water supplies and/or sewage arrangements and these could be disruptive to the local area
- Environment Agency believe where a sewage connection is not made the development may impact on water pollution control and previous pollution incidents indicate the network capacity issues
- The site is a source of a major aquifer and therefore there is potential contamination of water ground sources
- There have already been periodic disruptions to the mains water supply in Speen and additional housing will put further pressure of the supply
- Oil pipeline running through site requires access

Council response

Thames Water have been consulted on the site. They have raised concerns regarding the water supply capacity and waste water services in the area, specifically in relation to the water supply and wastewater network, which is unlikely

to be able to support the demand anticipated from the development. Water supply infrastructure and drainage infrastructure are likely to be required to ensure sufficient capacity it brought forward ahead of development. A water supply strategy and drainage strategy would be required and this requirement would be set out in a policy to guide the development of the site.

The Environment Agency has not raised any concerns over development on the site.

Development on the site would need to take into account the presence of the oil pipeline. It would be up to the developer to liaise with GPPS regarding the precise location of the pipeline and the mitigation required. It is considered that the site can be developed in a way that takes account of this issue.

Speen Allotments

Consultation comments

- Allotments are a community asset and have been an important part of community life since 1917
- Alternative land proposed is viewed as inferior
- Site proposed needs to be of a comparative gardening quality/horticultural equivalent
- The proposed allotment site has a reduced usable size due to poor shape and sun possibly inadequate for growing
- The site may receive pollution from the bypass
- Access to the allotments may be difficult (predominantly by car), potentially isolating users particularly for the elderly
- The current allotments have free access to water from an onsite stream, mains water access at the proposed site could increase rent
- The Allotments are an important green space and biodiversity could be lost if the site developed
- The ground within the proposed site has a slope
- Entrance to new site could be dangerous to turn out of due to bend in road on one side and a bridge and dip on the other
- Allotments provide a number of health benefits as evidenced by the UK Government scheme "Can you dig it – meeting community demands for allotments" scheme
- Site is almost entirely clay under a shallow layer of soil, rendering growing difficult
- New allotment location would be below the level of the A34 and therefore surface water runoff could contribute to contamination
- The proposed site does not currently meet standards for organic soil
- If the allotments were to be kept in the same location an emergency access road would reduce the size of the allotment site

Council response

The site promoter has confirmed that the allotments will be retained in their current position.

10. Landscape

Consultation comments

- Green infrastructure CS-18 needs to be considered more

Council response

A large proportion of the site is proposed to be retained as public open space, potentially including provision of a community orchard and meadow.

Specific details of Green Infrastructure would need to be considered at the planning application stage.

11. Pollution

Consultation comments

- Low air quality due to the proximity to the A34 and the A4
- Noise and light levels will be raised, particularly disruptive at night near the access road

Council response

Air quality and noise surveys would need to be carried out to accompany any planning application for the site.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW045: Land at Coley Farm, Stoney Lane, Newbury

Responses received: 70

A petition objecting to the development of NEW045 with 471 signatures was submitted to the Council.

1. Alternative sites

Consultation comments:

- focus on or near town centre not on the urban boundary
- brownfield sites, which will already have the infrastructure
- reuse vacant retail or office buildings in Newbury town centre
- area between A4 Bath Rd and Kersey Crescent (3 storey buildings which currently look mostly empty and dilapidated)
- THA023 and THA009 (near to reasonable roads and used for commercial purposes. Although access to the highway network would still be a problem being a fundamental issue for east Newbury)
- Newbury BT exchange
- site should be for agriculture to produce crops and livestock, the Government wants more to be home grown in the future
- ecologically less sensitive sites
- allocate one or two large sites to provide better infrastructure and quality development. Recommend NEW031A & B and NEW012 and NEW104. Sites with better existing bus service or closer to transport hubs should be allocated over this site
- Review the Core Strategy as a whole and meet the objectively assessed housing need through large strategic sites
- allocate for 40 dwellings taking into account the landscape comments to only develop the southern part of the site
- Neighbourhood planning should be encouraged more. DPD should have a policy requiring sites to be identified to meet a specific level of housing development for each spatial area through neighbourhood planning.
- land at Turnpike Road and Fir Tree Lane junction
- Reduce the amount of land Fir Tree Primary School and Nursery has

Council response

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement

boundary have a presumption in favour of development and therefore, do not need to be allocated.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing. A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

The intention of this DPD is to allocate land for residential development. In order for sites to be deliverable, it is obviously necessary for there to be cooperation from those parties with a legal interest in the land. Agriculture is not considered as development, therefore being outside the scope of this DPD and the planning system.

All sites have been subject to consultation with the Council's ecologist. No significant concerns have been raised in relation to this site. An extended Phase 1 Habitat Survey has been undertaken by the site promoter as it was considered that there was the potential for birds and reptiles on the site. Bat surveys and a reptile survey have subsequently been undertaken by the site promoter. Subject to appropriate mitigation/safeguarding no issues arising from the surveys undertaken to date are likely to affect the overall feasibility of the site for development.

The impact on the landscape and landscape character of the area would be a key consideration in the determination of any planning application. Policy CS19 focuses on the protection of the historic environment and landscape character. Additionally, In line with CS14 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD) any scheme would need to be designed to respect and enhance the character and appearance of the area.

Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Where a community wants to take up the opportunities offered by neighbourhood planning, the legislation enables three types of organisation, known as qualifying bodies, to lead it, namely a parish or town council; a neighbourhood forum; or a community organisation. Neighbourhood Plans are currently being developed in West Berkshire.

2. Development potential

Consultation comments:

- area is already highly developed and on a steep gradient
- urbanisation
- overdevelopment

- building NEW045 in combination with NEW105 will result in overpopulation of the area
- would set a precedent for further development along Stoney Lane
- higher density than neighbouring residential area and would change the character of the area
- if allocated then a policy with site specific criterion must be included in the DPD
- reduce to 40 dwellings in the southern part of the site to overcome landscape concerns
- would some of the development be suitable for the elderly?
- site would need suitable parking provision to reduce on street parking
- outside settlement boundary. Preference should be given to sites within settlement boundaries

Council response

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy sets out the spatial distribution for development across West Berkshire, including the Newbury and Thatcham Spatial Area. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the Newbury and Thatcham Area would be able to take the amount of development proposed. The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution.

Comments relating to the gradient/topography of the site are noted. The site promoter has indicated that the site is deliverable and this would be considered as part of the planning application stage.

NEW105 is not proposed to be taken forward.

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

New development would need to be in keeping with the character and density of existing residential development around the site.

Policies within the adopted Core Strategy would ensure that the development is acceptable in planning terms.

The site is considered to be in an area of medium landscape sensitivity. Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open space and landscaping, will be required in accordance with policy CS19 of the Core Strategy.

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community.

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. The site Travel Plan will encourage new residents to consider alternatives to the car for everyday journeys which will help to reduce traffic.

3. Consultation

Consultation comments:

- inadequate notification of residents.
- Council should have done a letter-drop to properties closest to the site
- Cold Ash Parish Council recommendation have not been taken in to consideration
- 16/08/14 Cold Ash PC meeting rejected the site. 85 members of public present.
- petition against the site (*do we have this?*)
- the Council has deliberately tried to hide the building of the houses by only giving out a couple of letters to the 2 or 3 houses directly opposite the site
- update documents with Cold Ash Parish Council March 2014 comments

Council response

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

Cold Ash Parish Council's comments have been taken into consideration and it is acknowledged that the Cold Ash Parish Council meeting on 16/08/14 took place.

Petition – Yes, the petition was received and has been taken into consideration.

The submission made by the Parish Council on 7th March has been checked and it can be confirmed that the information contained in Annexes B C and D was included in the Consultation Statement. Annex A was omitted though and we apologise for this. Appendix 2 of the Consultation Statement submitted to the Secretary of State will therefore be updated to include this. Assurances can be given that the information contained in Annex A was taken into consideration as part of the site selection process (An update also needs to be made to the Thatcham (Cold Ash) 5 February 2014 notes).

4. Ecology

Consultation comments:

- lots of wildlife in the area
- extended habitat survey needed
- site is either immediately adjacent or in close proximity to nationally important Ancient Woodland or Local Wildlife Site. Appropriate mitigation measures required.
- Housing will lead to both direct and associated damage to the Ancient Woodland and/or Local Wildlife Site nearby (whichever are present)
- Yates Copse and Stone Copse are Ancient Woodlands/Wildlife Heritage Sites
- keep areas for the wildlife and nature.
- any application for the site will need to provide a Drainage Strategy. (*Natural England*)
- loss of woodland which is an important habitat
- TPOs on site boundaries
- building on a current farm field will reduce green infrastructure

Council response

All sites have been subject to consultation with the Council's ecologist. No significant concerns have been raised in relation to this site. An extended Phase 1 Habitat Survey has been undertaken by the site promoter as it was considered that there was the potential for birds and reptiles on the site. Bat surveys and a reptile survey have subsequently been undertaken by the site promoter. Subject to appropriate mitigation/safeguarding no issues arising from the surveys undertaken to date are likely to affect the overall feasibility of the site for development.

It is accepted that there are Local Wildlife Sites (LWSs) in close proximity (not adjacent) to both the east and west of the site, and that these areas are also designated as semi-natural ancient woodland, however it is not considered that development of the site would have a significant impact on the LWS or semi-natural ancient woodland.

It is acknowledged that there are TPO protected trees on the north western boundary and a suitable root protection buffer would likely be required as part of the development of the site. However, trees protected by TPOs can be removed, with prior approval from the Council. Usually permission is approved subject to alternative planting being provided on the site.

A drainage strategy, and also an assessment of the hydrological impact of the development would be requested as part of any planning application on the site. Groundwater monitoring is being undertaken by the site promoter over the winter months (2015/16) and this will inform the Flood Risk Assessment and drainage strategy.

It is accepted that building on greenfield land could potentially reduce green infrastructure, however development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. Green Infrastructure, including public open space and landscaping, will be required in accordance with policy CS19 of the Core Strategy.

5. Flooding

Consultation comments:

- lack of published SUDS standards could mean increased flooding nearby.
- the drift geology poses a flooding risk
- unstable ground. Clay sand hill on a hardpan of ironstone approximately 9 to 10 metres below the surface which stops the water penetrating any further. Swollen by rainwater it will surface at a lower point down the hill as springs therefore causing flooding due to run-off from the roofs and surface drains. The extra volume of water will wash sand from the clay this in turn will cause slippage of the hill site when it dries out which is not suitable for housing.
- a complex area of drift geology , with mixed sands, clays and gravels.
- area is prone to water management issues, existing development will need protection
- water run off held on site during last couple of winters, development will alter nearby water flows by removing this storage. Likely to impact existing property and residents.
- building on the land will prevent rainwater soaking into the soil and create runoff. The drainage system will be unable to cope.
- covering greenfield with tarmac will increase runoff causing flooding of greater intensity than that seen in July 2007.
- Manor Park, Waller Drive, Fleetwood Close, Turnpike Industrial Estate and Cresswell Close flooded in 2007.
- potential to increase flood risk to nearby critical drainage area and properties within or adjacent to it
- significant flood risk to Manor Park.
- would require major investment in flood retention ponds, and berms, along with an effective SUDS implementation.
- site is upstream from a nearby critical drainage area

Council response

The site is in Flood Zone 1, although it is adjacent to a surface water floodrisk area. A Flood Risk Assessment (FRA) would be required taking into account all sources of

flooding including surface water flooding. Sustainable drainage systems (SUDs) would need to be provided and details of this would be included within the FRA. The FRA would also take into account the impact on floodrisk downstream of the site and if necessary measures to mitigate this would be specified. A site assessment is currently being undertaken by the site promoter which includes monitoring of groundwater on the site over the winter (2015/2016) months. Recommended design parameters should be provided in the final report, and this will inform the FRA and SUDs design.

6. Highways and transport

Consultation comments:

- Stoney Lane is already busy and the development would significant increase the traffic
- loss of a quiet country lane enjoyed by walkers, horse riders, cyclists
- speedy traffic quickly reduce speed for the junction
- Lower Stoney Lane is mostly populated by older people
- cars park on Stoney Lane between Waller Drive and Kiln Road, making it difficult to pass. The road here cannot be widened.
- major highway works will be needed
- object to a potential access via Laud Close, or Wansey Gardens
- preferred option text only refers to Stoney Lane access. The Council by this statement confirms that access should only be proposed from Stoney Lane and therefore reference to a secondary access in the Site Assessment should be deleted
- unlikely to gain access from Manor Park as would require residents to sell parts of their land
- improvements needed to Stoney Lane to provide access to the site
- improvements to Stoney Lane could make it a cut through route and increase traffic further
- widening Stoney Lane from Cold Ash to Newbury sides would ruin the country lane
- widening Stoney Lane would require removal of hedgerows and trees, causing immense damage to the narrow lane and Waller Park, impact on the Green Infrastructure
- is road widening of Stoney Lane feasible as likely to be expensive
- limited visibility at Pine Ridge and Field Ridge junctions with Stoney Lane
- residents would use Kiln Road, address the flow of this road before building new properties
- increased traffic on already busy local roads
- existing concerns with speed of traffic through adjoining Manor Park which is likely to become a rat run for access from the site to the A4. Is traffic calming proposed?
- Waller Drive would be used as a rat run to avoid the congestion at the Turnpike
- bus stops are too far away to be useful. Would there be improvements to public transport links?
- Cold Ash PC 2013 traffic survey had 840 daily car motions on Stoney Lane. Based on 1.9 cars per household (census) this is 285-380 movements per day

(34-45% increase). If NEW105 is added, this will create 720 daily additional movements (86%).

- Traffic in Kiln Road/Turnpike is high at c.30k movements/week with frequent tail-backs. The new housing would generate an additional c.3-4k movements/week
- additional traffic will still face bottlenecks on the main Newbury roundabout (A339, B4009, London Roads)
- Access to M4 via Kiln Road – Shaw Road – main roundabout in Newbury is critically blocked in peak hours and during most weekends. Spreading traffic via Turnpike Road is not a solution as London Road is equally blocked on the same roundabout.
- existing access to the highway network is already completely inadequate during busy hours
- parking on Shaw Road and the position of bus stops stops the flow of traffic on this busy road
- Kiln Lane is already overloaded and recent development has made it worse.
- Kiln Road has cars parked on the street, has been narrowed by cycling provision, and a dangerous pedestrian crossing at Shaw Bridge to get children to Trinity School.
- increased risk of road accidents especially on Stoney Lane and Kiln Road. Stoney Lane is steep in places, narrowing to single lane, with no street lights and many blind bends.
- public transport is not the answer; most people have to travel to work locations away from public transportation routes. Schedules and routes do not correspond with work locations, many schools or serve the local station.
- Stoney Lane is listed as a quiet lane
- Stoney Lane has no footpath along single lane sections
- increased pollution from additional traffic
- Stoney Lane is used by walkers, dog walkers, cyclists, horse riders, runners
- transport assessment required
- put road improvements in place early on or before construction starts
- noise pollution from additional traffic
- cars would use Stoney Lane as a short cut to the M4 and A34, avoiding the Turnpike Road traffic.
- Stoney Lane can be icy during winter pushing traffic to other roads
- neighbouring Manor Park is high car dependency
- during the 2013 floods the road bridge was closed
- local roads are already congested, unclear how mitigation through a transport assessment or travel plan can help. The roads are already inadequate for the current level of traffic even without further increase.

Council response

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion. The TA provides a worst case scenario and does not take into account mitigation, Travel Planning, or general highway improvements that improve traffic flow. Where the TA has shown a specific need for mitigation

measures this will be taken forward as part of the IDP, which is a 'live' document with regular updates.

It would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced for the site at the planning application stage, which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users.

Cold Ash Parish Council's comments regarding numbers of traffic movements are noted.

Primary access to the site is proposed from Stoney Lane. The site promoter has stated that the necessary highway improvements to Stoney Lane can be achieved. It is the view of the Council that access can be obtained via Stoney Lane, but the lane would need to be widened with footways provided to connect the site to existing footways along Stoney Lane. If land can be acquired, secondary accesses could also be provided via Wansley Gardens, Laud Close and Fleetwood Close.

It is accepted that there would be an impact from the widening of Stoney Lane, however, one of the Core Strategy strategic objectives is to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside. This approach is strengthened by policy CS19 which focuses on the protection of the historic environment and landscape character. In line with CS14 of the Core Strategy and the Quality Design SPD any scheme would need to be designed to respect and enhance the character and appearance of the area.

CS18 states that new developments will make provision for high quality and multifunctional open spaces of an appropriate size, and will also provide links to the existing green infrastructure network. It goes further stating that where exceptionally it is agreed that an area of green infrastructure can be lost a new one of equal or greater size and standard will be required to be provided in an accessible location close by.

It is acknowledged that increased car movements and a higher number of people living in the area would increase noise levels locally. This increase in noise is unlikely to be significant, however if considered necessary this issue would be dealt with at the planning application stage by the Council's Environmental Health Department.

7. Infrastructure

Consultation comments:

- low water pressure could get worse with development
- inadequate provision of shops, local services and public transport

- public transport is not an attractive alternative to a car, poor pedestrian and cycle access to amenities – leads to car use and increased congestion.
- nearest bus stop is down a steep hill on Kiln Road, making it difficult for the elderly and families with children.
- bus frequency is very low and cannot be easily used for accessing main shops, train station or surgery in Newbury
- No bus route passes the site. A 3km walk to a train station is unsustainable and not reasonable.
- would object to buses using Waller Drive
- pipeline runs in close proximity to the site, has this been taken in to account?
- wastewater system is likely to need improvements to accommodate additional demand.
- sewer is known to have collapsed in places within the area.
- Turnpike area has no GP surgery, no pharmacy and no dentist.
- poor internet
- do the schools have capacity?
- concern with capacity at GP surgeries and schools
- (standard EA response re foul drainage)
- this year some nearby properties experienced flooded homes and sewage flooding in gardens and properties
- site is remote from the existing commercial bus route (service 1). Involves a serious walk uphill on the return leg to get to and from the nearest bus stops, which is far less than ideal for encouraging sustainable, non-car based local travel (*WBC Passenger Transport*)
- retain and do not build on the recreational space at the corner of Waller Drive
- no adequate children's facilities nearby. Expect main recreation routes (by car or foot) to be via Stoney Lane towards Cold Ash, however the road is narrow in places with limited visibility, has no street lights, and being steep can be dangerous in poor weather conditions

Council response

The Infrastructure Delivery Plan of the Core Strategy considered the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services) could be sought through the CIL.

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion. The TA provides a worst case scenario and does not take into account mitigation, Travel Planning, or general highway improvements that improve traffic flow. Where the TA has shown a specific need for mitigation measures this will be taken forward as part of the IDP, which is a 'live' document with regular updates.

Detailed modelling is not currently available for this site; however it would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced for the site at the planning application stage, which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, Improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users.

The site is approximately 3km from Newbury which has a good range of shops and services. With the rise in online shopping and supermarket delivery services, the proximity of a site to a local shop is of less importance that it may have been in the past.

Consultation has taken place with Thames Water. Thames Water has indicated that it has no concerns over infrastructure for water supply but that it would have concerns over wastewater services and this would need to be addressed through a drainage strategy being supplied with any planning application on the site. The requirement for this would need to be set out in any policy for the site.

With regard to the nearby pipeline, the site promoter indicates that it is approximately 45m from the closest boundary of the site (the south west corner).

The site is in Flood Zone 1, although it is adjacent to a surface water floodrisk area. A Flood Risk Assessment (FRA) would be required taking into account surface water flooding. Sustainable urban drainage systems (SUDs) would need to be provided and details of this would be included within the FRA. The FRA would also take into account the impact on floodrisk downstream of the site and measures to mitigate this would be specified. Groundwater monitoring is being undertaken over the winter months (2015/16) and this will inform the FRA and drainage strategy.

All sites are required to provide a degree of open space in line with policy RL.1 of the West Berkshire District Local Plan 1991 – 2006 (Saved Policies 2007). Development of the sites could improve open space and recreational facilities in the village.

CS18 states that new developments will make provision for high quality and multifunctional open spaces of an appropriate size, and will also provide links to the existing green infrastructure network. It goes further stating that where exceptionally it is agreed that an area of green infrastructure can be lost a new one of equal or greater size and standard will be required to be provided in an accessible location close by.

8. Landscape / setting

Consultation comments:

- should retain the landscape character and the character of the site as a gateway to Ashmore Green and Cold Ash
- visually prominent extension to the urban landscape, especially when viewed from the South
- gap between Newbury and Thatcham
- greenbelt
- widening Stoney Lane would have detrimental impacts on the character of the area
- loss of countryside and its views. Loss of countryside on our doorstep
- sensitive landscape
- landscape is of a high character and represents a front-line buffer zone to the AONB
- site is comparable to AONB
- Stoney Lane has Civil War history and should be protected in its current state – was known as ‘Blood Lane’ and had a nursing encampment in Weavers Wood
- 18th Century hedgerow and canopies in Stoney Lane
- continual building is changing the historic market town character of Newbury
- NPPF para 109 refers to “protecting and enhancing valued landscapes”
- preserve the tranquillity, wildlife and views
- how can development of this scale be designed to protect the existing character of the area?
- the mix and density will change the whole character of the area
- damage to the rural gateway to Ashmore Green. Extends the intrusive urbanisation on a highly visible slope.
- a challenging steep sloping site
- no landscaping work can mitigate turning a piece of rural land in to a residential development
- increased car movements and people living in the area will increase noise levels
- only develop the southern part of the site. Site should therefore be for approximately 40 dwellings to avoid landscape impact.

Council response

The site is considered to be in an area of medium landscape sensitivity. Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open

space and landscaping, will be required in accordance with policy CS19 of the Core Strategy.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire. The general concern is noted however.

A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore, be essential that any new development helps sustain this strong sense of place and local identity. One of our Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside and this approach is taken forward in policy CS19.

West Berkshire has no greenbelt.

Development would need to take into account the historic character of the area. This would be considered at planning application stage.

Comments relating to the gradient/topography of the site are noted. The site promoter has indicated that the site is deliverable and this would be considered as part of the planning application stage. The design of the site would need to respond effectively to the topography of the site in terms of design and layout.

It is acknowledged that increased car movements and a higher number of people living in the area would increase noise levels locally. This increase in noise is unlikely to be significant, however if considered necessary this issue would be dealt with at the planning application stage by the Council's Environmental Health Department.

9. Site planning history

Consultation comments:

- previous applications have determined that Stoney Lane cannot be widened without significant detrimental impact to the existing hedgerows and habitats.

- previous applications have been refused for the reasons listed above so how can this now be put forward for possible allocation?
- previous objections from residents to 2008 application have not been taken in to account
- Council's landscape consultant objected to the previous application. No significant changes to national planning policy since.

Council response

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary have a presumption in favour of development and therefore, do not need to be allocated.

The impact on the landscape and landscape character of the area would be a key consideration in the determination of any planning application. Policy CS19 focuses on the protection of the historic environment and landscape character. Additionally, In line with CS14 of the Core Strategy and the Quality Design SPD any scheme would need to be designed to respect and enhance the character and appearance of the area.

CS18 states that new developments will make provision for high quality and multifunctional open spaces of an appropriate size, and will also provide links to the existing green infrastructure network. It goes further stating that where exceptionally it is agreed that an area of green infrastructure can be lost a new one of equal or greater size and standard will be required to be provided in an accessible location close by.

10. Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)

Consultation comments:

- site assessment does not appear thorough or objective
- other sites were rejected for same reasons, this site was not rejected. Reasons are toned down and used as neutral or even as positive justification to recommend the site for development
- not robust or factually correct
- with so many unknown impacts it brings the question if analysis has been sufficiently thorough with proper on-site assessment
- Cold Ash Parish Council comments are not taken into consideration
- question the objectivity of research and analysis done to recommend this site as a preferred option

Council response

The Council is required to undertake assessment to consider the impact of development on sustainability through the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process. This considers the impact of development on environmental, social and economic factors and where a significant negative impact is shown a site has not been recommended for allocation.

The Housing Site Allocations DPD will be subject to a second period of consultation and following this it will be submitted to the Secretary of State for examination. The Examination process provides an independent review of whether all proposals in the plan are based on sound evidence, which will include a review of the Council's evidence on flooding, traffic etc.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Cold Ash Parish Council's comments have been taken into consideration.

11. Comments from the site promoter

- support the inclusion of the site.
- Background work has commenced.
- Updated Preliminary Ecological Assessment shows no ecological aspects which would preclude development on the site, with appropriate mitigation.
- Access, hydrology and landscape work is ongoing.
- Concept plan with residential, open space, pedestrian links, enhanced existing landscape, potential for further habitat and nature conservation resources.
- Highway improvements to Stoney Lane will be achieved.

Council response

Comments are noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW047D: South East Newbury, land north of Haysoms Drive and adjoining Equine Way

Responses received: 36, including 1 inadmissible comment

1. Development potential

Consultation comments:

- Policy does not address the real cause of ever increasing need for housing and climate change
- Current housing expansion is sufficient for local needs
- Setting precedent to further develop adjacent green fields
- Loss of semi-rural character
- Racecourse development is too dense and with no proper roads in/out

Council response

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy sets out the spatial distribution for development across West Berkshire, including the Newbury and Thatcham Spatial Area. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the Newbury and Thatcham Area would be able to take the amount of development proposed. The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution.

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

A considerable amount of public open space/wildlife corridors will be provided should the site be developed which will help to retain the semi-rural character of the area.

New development would need to be in keeping with the character and density of existing residential development around the site.

Development at the Racecourse has been granted planning permission. Concerns over density and access are noted.

Land use

Consultation comments:

- Loss of green belt land which should only be considered for development once all brownfield sites have been exhausted
- No plans for developing on brownfield sites over Greenfield ones
- Brownfield sites have not been investigated enough – these should be the first priority (Sterling Cables and LRIE would eliminate the need for this site)
- Plenty of uncongested infrastructure in other areas of Newbury that would benefit from some housing
- Find land elsewhere, there is plenty available

Council response

Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary.

The Preferred Options DPD set out the Council's position on London Road Industrial Estate as a site for potential future allocation. Sterling Cables has been granted planning permission for residential development.

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy. While other sites may be being promoted, their allocation would be contrary to the spatial strategy of the Core Strategy, or some of the evidence collected indicates that the development would have a significant negative impact.

Development in Greenham

Consultation comments:

- Greenham has been grossly over-developed in recent years (3500+ homes) – need to know the full impact before more development takes place
- Other areas of the district need to take their share of development – Greenham has already too much planned

- Need for period of stability in Greenham

Council response

It is noted that Greenham parish has received the two strategic allocations through the Core Strategy. The Council are only able to consider land that is submitted to them through the Strategic Housing Land Availability Assessment (SHLAA). The in-combination effects of development have been considered when looking at the available options to establish deliverability.

2. Consultation process

Consultation comments:

- Lack of time and information provided by WBC to fully understand the DPD and response in an appropriate/thoughtful manner
- Carried out during summer holidays
- Communication to residents of the consultation and deadlines has been inadequate
- Timescale for people to comment is too short

Council response

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

3. Coalescence of settlements

Consultation comments:

- Site is/was designated as green barrier between Newbury/Greenham –

- “Greenham Gap” gap between settlements - this is a long established and protected green buffer.
- Loss of space between Greenham and Newbury – communities will merge into one
- Precedent to completely loose open space between Greenham and Newbury

Council response

The ‘gap’ policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation ‘strategic gap’ or ‘local gap’ therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states ‘to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire’s towns, villages and countryside’ and this approach is taken forward in policy CS19.

The site promoter is proposing to retain a gap between the settlements of Newbury and Greenham by providing a significant area of public open space/wildlife corridor. It is likely that this would be handed over to be in public ownership, which would prevent future development on the site.

4. Ecology

Consultation comments:

- Site has several species of amphibian (inc. GCN)
- Greenham Common is already heavily used to the detriment of rare and scarce ground nesting birds
- The common is degrading to a leisure area, rather than a nature reserve
- Would like assurance that the green lung between Newbury and Greenham would be conserved in perpetuity
- Proximity to Greenham and Crookham Commons SSSI

- Increased population within walking distance of the commons – increased visitor numbers
- Potential for increased disturbance
- Impact on protected species (reptiles, birds)
- The council will need to ensure appropriate avoidance and mitigation measures are implemented
- Request open dialogue with BBOWT as to how best to implement avoidance and mitigation measures
- The very designation of a SSSI should exclude development
- Impact of human and canine disturbance in the SSSI
- Impact on a range of species who use the site (deer, barn owls etc.) this has not been fully considered
- Green gap is a local wildlife habitat
- Need to protect environment/ecology
- What ecological studies have been done?
- Loss of nature corridor
- Concern for NE due to Great Crested Newts in the area – thorough assessment would be required included surveys together with details of alternative sites considered to assess and justify the need to allocation housing here

Council response

The site is not within or adjacent to the Green ham Common SSSI, although the site is just over 600m from the SSSI. Consultation has taken place with the Council's ecologist. It has been noted that the site contains Great Crested Newts. The site promoter has confirmed that an area of open space would be retained between the two parcels of development to allow for a wildlife corridor and public open space in perpetuity. The provision of this area of public open space, which is not currently available to the public, may help to reduce the impact on Greenham Common.

An ecological constraints report has been submitted for the site. The development areas are not within a designated site for nature conservation or support habitats of principle importance. The report confirms the site supports protected species and species of principle importance (great crested newts and common reptiles). There are potential opportunities for delivering appropriate mitigation, compensation and enhancement measures.

The requirement for land to be kept in perpetuity for wildlife and as public open space will be set out in the site policy.

5. Employment

Consultation comments:

- Where will people who live in all these new houses work? – likely to be commuting out – housing should be put near where the jobs are

Council response

There are a number of job opportunities in the Newbury area, with regular bus services, cycle and walking routes, enabling people to travel to work without the need to drive.

6. Flood risk

Consultation comments:

- Drains cannot cope with surface water runoff after heavy rain
- Water flows down Greenham Road now in heavy rain, additional houses will make this worse

Council response

The site is at low risk of flooding. A Flood risk assessment would need to be provided for the site at planning application stage, considering all sources of flooding and recommending mitigation measures where appropriate. Sustainable Drainage Systems (SUDs) would be required.

The issues raised above relate to highway flooding issues. There is no evidence of flooding along Greenham Road from the last two significant flood events in West Berkshire (July 2007, Jan/Feb 2014).

7. Highways and transport

Consultation comments:

- Transport Assessment needs to be considered all existing development going on, on its own 120 houses aren't likely to have much impact – with all other development there is a significant impact
- Would like to see traffic survey to show how the area will cope with increased traffic when it cannot cope now
- Traffic at retail park/A339 roundabouts is already an issue – only likely to get worse with additional development
- Congestion at all local junctions (Greenham Road, Pinchington Lane, Equine Way, Pyle Hill)
- Need to sort out congestion

- Any road closures across the town cause major issues on the A339 showing the vulnerability of the road network through the town
- This is a rural town and yet experiences bottlenecks and delays in the same way as a big city
- Most houses will have 2 cars
- Significant delays on Pinchington Lane/Greenham Road every morning
- Lack of west side traffic route through town (other than the bypass)
- Racecourse developer has had difficulties meeting the highways mitigation requirements of its planning permission
- Lack of road maintenance, only likely to get worse with more people using the roads

Council response

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of all the preferred options sites (in combination) would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion. Background traffic growth is shown to have more of an impact on the highway network than development of the preferred options sites. A Transport Statement would be required to accompany a planning application for the site, which would look at the impact of the development on the local road network and suggest mitigation measures that may be required. A Travel Plan, setting out measures to encourage alternative modes of travel to the car would also need to be provided.

Improvements to the A339 roundabout are proposed as part of the Sandleford Park Infrastructure Delivery Plan. The specific details regarding the improvements will be considered as part of the planning application for the site.

Individual road closures throughout the town are not regular occurrences.

Average car ownership in Newbury is 1.3 cars per household, this is the same as for the Greenham ward (2011 census). Survey work carried out for the proposed new parking standards surveyed the development at Montague Drive and Laurel Gardens showed an average of 1.4 cars per dwellings, with Mandarin Drive having an average of 1.2 cars per dwellings. While it is recognised that some households will have 2 cars, it is unlikely that this would be most households within the development.

It is noted that there are limited routes through Newbury from North to South. The Council encourages use of the A34 (Newbury Bypass) for through traffic travelling from South to North. It is unlikely that any new additional crossing of the railway and canal will be delivered.

Highway improvements associated with the Racecourse development are progressing as required by the conditions of their planning permission.

Highway maintenance is carried out in accordance with the Council's Highway maintenance plan. Pot holes and other maintenance issues can be reported to the Council and will be investigated and repaired where they meet the relevant criteria.

Access

Consultation comments:

- Where will the access be – on to Greenham Road, Equine Way or multiple access points?

Council response

The site promoter has indicated that access is likely to come from Pinchington Lane and Haysoms Drive as well as Greenham Road. The two developable areas of the site are to be kept separate and therefore, would require separate access points.

Parking

Consultation comments:

- Lack of parking – parking on Westwood estate has reached dangerous levels of drivers trying to negotiate the parked vehicles

Council response

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

Public Transport

Consultation comments:

- Acceptable bus services in the area
- Desire of The Council's Transport Services team to restore a 30min (or better) frequency service linking Greenham with the town centre

Council response

New development in this area should help to support, and improve local bus services.

8. Infrastructure

Consultation comments:

- Amenities are insufficient to cope with present population
- No plans to improve infrastructure to deal with existing development taking place
- Insufficient infrastructure associated with Sandleford Park development (specifically schools and roads)
- Impact on local amenities - dentists, libraries and leisure facilities
- Need open space

Council response

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide

infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

The required infrastructure for Sandleford Park is set out in the IDP with further details in the Supplementary Planning Document. If adequate infrastructure provision/improvements are not proposed planning permission will not be granted, or permission would be granted subject to condition that the relevant improvements are made.

The site promoter is proposing that a large proportion of the site is left as public open space in perpetuity, which will help to improve access to open space in this area as the site currently does have any official public access.

Utilities

Consultation comments:

- Drainage issues at the bottom of Greenham Road – drains cannot cope

Council response

Thames Water has been consulted on the development of the site. They have not raised any concerns regarding water supply, however they have raised concerns regarding waste water services in the area. A drainage strategy would be required as part of any planning application to determine the exact impact on the waste water infrastructure. This would be included as a policy requirement.

Education

Consultation comments:

- Pressure on schools
- Park House and St Barts are already oversubscribed
- Would be unable to cope with pupils from Sandleford and the other proposed sites
- Are there enough places at primary schools? Many appear to be overflowing

Council response

Consultation with the Local Education Authority has indicated that additional primary school capacity is to be provided at Newbury College to meet the demand of demographic growth in Newbury, including development of new sites. The development of Sandford Park will provide two new primary schools to meet the demand from this strategic site.

There is no concern from the LEA regarding secondary capacity in this location.

Doctors

Consultation comments:

- Lack of doctors surgeries in the area
- Falkland surgery is at capacity and difficult to get an appointment

Council response

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP).

9. Landscape/setting

Consultation comments:

- Need to preserve green space for all to enjoy
- Loss of visual separation between settlements
- Loss of valuable green space
- Loss of local character of the area

Council response

The site promoter is suggesting that a large area of public open space is provided between the two developable areas in perpetuity. This would improve access to open space in the area as there is currently no official public access to the site. This area of open space would maintain the visual separation between Greenham and Newbury.

Development would need to be in keeping with the character of existing development.

10. Pollution

Consultation comments:

- Noise
- Air quality
- Contamination
 - The site is a former landfill site
 - A number of investigations have taken place associated with other developments in the area
 - A full detailed site investigation would be required
 - Likely to be restrictions (as per other development in the area) on drainage and deep foundations which would have the potential to mobilise contamination in the underlying aquifer
- Is it safe to build on a site with gas vents due to previous use as a tip?

Council response:

It is unlikely that development of the site will have a significant impact on noise or air quality pollution, however the development would be informed by a noise and air quality survey that will advise on any necessary mitigation measures.

It is recognised that the site is a former landfill site. The site specific policy will set out the requirements for a full detailed site investigation to be carried out. The site promoter has provided a desk contamination top study. A number of development have taken place in the surrounding area, many of which have been on former landfill sites, therefore, it is acceptable to build on former landfill sites, subject to certain environmental restrictions and suitable construction measures. In many cases development can help to improve the levels of contamination. The Environment Agency will be consulted at planning application stage regarding appropriate construction methods to ensure contamination mobilisation does not occur.

11. Personal

Consultation comments:

- Impact on quality of life
- Impact on small community
- Disruption during construction phases

Council response

Construction disruption can be controlled by planning condition limiting the hours of work and the times of deliveries to cause least disruption.

New development needs to take into account the existing residential development, and work to integrate with it.

12. Comments from the site promoter

- Support allocation of the site
- Site could be delivered independently or as part of comprehensive South East Newbury development – there is no interdependency between this site and the wider scheme for the area
- Site can deliver an area of open space – created and managed for wildlife and an area of public open space in perpetuity between Newbury and Greenham
- The site is in a sustainable location – access to Pinchington Lane, Haysoms Drive, Pedestrian/cycle routes linking to the surrounding area
- Careful consideration given to ground conditions – study carried out making the following recommendations:
 - Pile foundations
 - Suitable protection and sealing of previous landfill
 - Clean sub and top soil imported for gardens
 - Gas resistant membranes and passive venting systems to flood plates
- Development on surrounding sites would indicate that development is acceptable on former landfill sites
- A detailed mitigation and management strategy has been developed for the ecological impact of development – agreement has previously been reached between the Council’s ecologist and Natural England regarding mitigation and management of the open space elements of the site
 - Retention and enhancement of the majority of marshy habitat
 - Management and maintenance of underdeveloped areas for GCNs and reptiles
 - Provision of SUDs
 - Provision of roosting fractures for bats and nesting features for birds
 - Management of public access with interpretation boards
- Committed to deliver a high quality scheme:
 - At least 120 dwellings in the short term
 - 40% affordable housing
 - Multi-functional green infrastructure (inc. open space, habitat creation, links to wider countryside and securing a new ‘green gap’ between Newbury and Greenham
 - Effectively manage and mitigate ground conditions
 - Market and affordable housing in variety of sizes to meet local needs

- Deliver a scheme with the highest standards of urban design and incorporating best practice in sustainable construction, sustainable living and energy efficiency

Council response

The comments are noted. It is useful to know that the site can be delivered independently from the other sites promoted in this area, or as part of a comprehensive South East Newbury development.

The area of public open space and wildlife corridors would need to be provided in perpetuity, and most likely be handed over into public ownership.

The Environment Agency would need to be consulted on the construction methods, due to the previous use of the site as a landfill site. This would be done at planning application stage. However, as other sites in the immediate area have been constructed on landfill sites, it is not anticipated that there would be a significant impact on deliverability.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW104: South of Warren Road, Newbury

1. Ecology

Consultation comments:

- The site is in close proximity to ancient woodland and or a Local wildlife Site – potential for harm to be caused by development itself, or indirectly by additional use of the site. Mitigation measures or impact avoidance measures would be required
- Impact on Greenham and Crookham Commons SSSI –Impact need to be assessed in terms of increased disturbance and recreational pressure

Council response

Initial screening of the sites by the Council's ecologist has taken place. No concerns have been raised with this site.

The site is not adjacent to ancient woodland or a Local Wildlife Site. Mitigation measures to protect the Ancient Woodland and LWS will be put in place as part of the Sandford Park development.

The site will be within easy walking distance of the Sandford Park country parkland, which should help to reduce the pressure on Greenham Common.

2. Highways and transport

Consultation comments:

- Requires use of Warren Road as main access
- Warren Road is a busy pedestrian route to Park House School
- Congestion on the A343, especially when the A34 is closed
- Forcing traffic to turn left out of Warren Road will turn down Conifer Crest and into Wash Common creating a rat run
- Safe car free access route is a sensible option to encourage walking/cycling
- The A343 is one of the safer roads for cycling and should be kept that way
- The developer is not the best person to investigate the access options – cost may prevail over safety and common sense
- Traffic impact on other junctions along the A343 (Gun roundabouts, Battery End, Wash Water)
- No construction traffic should be allowed to use Warren Road for access

Council response

It is recognised that access to the site would be via Warren Road and that this is currently used as a main access point to Park House School. Improvements to Warren Road will take place as a result of the development at Sandlesford Park. The details of the junction improvements required by the development of Sandlesford Park will be considered as part of the planning application for Sandlesford Park. The Council is in the process of having additional detailed Transport Assessment work done in relation to Sandlesford Park.

It is noted that the A343 becomes congested when the A34 is closed; however, this is not a regular occurrence.

Details relating to construction traffic will be dealt with a planning application stage and movements can be controlled by condition.

3. Historical Environment

Consultation comments:

- In close proximity to grade II listed Warren Lodge Presbytery, although difficult to see the exact relationship from DPD maps – consideration would need to be given to this at planning application stage as to not affect the listed building

Council response

Comment is noted. Consideration of the impact on Warren Lodge would be considered as part of any planning application.

4. Infrastructure

Consultation comments:

- Shops at Wash Common will attract additional footfall as development grows
- Local garage will be the closest filling station for the new estate

Council response

Comments noted, it is likely that new residents will use the local centre at Wash Common and the Sainsbury's garage.

5. Links to Sandlesford Park

Consultation comments:

- Related to planning proposal for Park Cottage and the proposed 'all vehicle access' rewording of the DPD
- A339 access would be a safer choice
- Details should have been made available much earlier and prior to the DPD being published
- No modelling can replicate human nature or predict the future

Council response

This site is in private ownership, and is not related or linked to the development of Sandlesford Park in anyway other than location.

The previous Sandlesford Park SPD stated that at least two accesses would be required and requested that additional accesses were investigated. Further investigation by the site promoters and the Council has found that additional accesses to Sandlesford Park will be beneficial and therefore, this new evidence has been used to update the SPD to require additional accesses to the site. The final decision about the number of accesses will come through the planning application for the Sandlesford Park Site.

The Council's Transport Model is based on a number of factors including detailed traffic counts, traffic monitoring and roadside interviews. This provides a robust indication of people's travel habits to predict what future residents would be likely to do within the model.

6. Comments from the site promoter

- Support allocation of the site
- Newbury is the largest and most sustainable location for new housing in the district
- Happy to work with the Council and adjoining landowners to deliver the site. The site could come forward independently
- The only negative impact in the SA/SEA is that the site is a Greenfield site, which is the same for all the sites put forward
- The site is suitable for small scale residential development

- Uniquely positioned between residential development and land allocated for housing at Sandford Park – provides a natural and logical continuation of existing and proposed residential development in the area
- Well related to Wash Common
- Visually well contained, screened by trees and hedgerow
- Not affected by any statutory designations
- No constraints to impact on the availability, suitability or achievability of the development
- Suggest the following amendments to the wording of the proposed allocation
 - Site description: garden land (including orchard and vegetable plot)
 - Description should acknowledge that site directly adjoins the settlement policy boundary for Newbury
 - Density should be in keeping with existing residential development

Council response

Support for allocation, and comments noted.

Suggested amendments noted and updated.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

NEW106: Land at Moor Lane Depot

Responses received: 142

- Comments submitted on behalf of the Croft Lane Residents Association were supported by 22 responses
- Approximately 17 responses appear to be based to some extent on a standard response (rather than a template – the same headings, phrases and spelling mistakes appear)

1. Access/road safety/highways:

Consultation comments:

- steep gradient and poor visibility at Hill Road / Speen Lane junction
- achieving visibility at the junction would require land acquisition
- Hill Road is narrow with no footpath
- widening would require land
- Speen Lane and Hill Road are popular for walkers, runners and cyclists – concern over safety in road without footpath and increased traffic putting them at more risk
- Speen Lane is narrow in places which is already difficult to navigate with parked cars, extra traffic from the development would make this worse
- Footpath is narrow and non-existent in places
- since the opening of the bypass there has been a significant increase in traffic on the A4, and Speen Lane has become a 'rat run' at peak times for motorists to avoid queuing
- daytime parking
- extra traffic at junctions at both end of Speen Lane (Old Bath Road and A4) which are difficult to exit
- site may be close to the town centre but majority of houses will have 2 cars and most people will use their cars to go to work.

Council response

It is acknowledged that Hill Road is steep and so the Hill Road / Speen Lane junction is steep, and visibility is poor when exiting the junction.

It is the Council's position that access could be obtained via Hill Road; however Hill Road would need to be widened and adopted as a public highway. A footway would also be required to connect the site to existing footways along Speen Lane. Sight lines onto Speen Lane are limited however, and are therefore a concern, as is the gradient up to Speen Lane.

The site promoter has been unable to demonstrate the ability to achieve suitable sightlines and the construction of a pedestrian route. For these reasons the site is not being proposed to be taken forward for allocation.

Detailed modelling is not currently available for this site; however in the event that planning application came forward it would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users. As has been stated above the site is not being proposed to be taken forward for allocation.

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. As has been stated above the site is not being proposed to be taken forward for allocation.

2. Hydrology:

Consultation comments:

- Groundwater flood risk (from WBC supporting docs)
- Surface water flood risk (from WBC supporting docs)
- Goldwell Park had flood mitigation measure so this site should too as it is the same level a few hundred metres away
- Site has poor drainage and historically prone to water-logging.
- Groundwater source protection zone/Risk of groundwater contamination
- Proximity to borehole
- Flood Zone 1

Council Response

The site is Flood Zone 1, within an area of groundwater and surface water flood risk although there is no evidence that the site has flooded. An FRA would be required and appropriate mitigation including SUDs provided in the event that planning application came forward. The site is however, not being proposed to be taken forward for allocation.

The EA has indicated that 10% of the site is underlain by major aquifer, and that the site is within a Source Protection Zone (SPZ3) although the EA has no in principle objections to development in SPZs. In the event that a planning application came forward, where necessary, evidence would need to be provided to show that the risk of contamination could be satisfactorily mitigated. The site is however, not being proposed to be taken forward for allocation.

3. Landscape / townscape character and design:

Consultation comments:

- Landscape
- Density too high / out of character / not in keeping with surrounding area
- Precedent for more development

Council Response

Although the site is not being proposed for allocation, it is considered to be in an area of medium/high landscape sensitivity. Any scheme that came forward would need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open space and landscaping, would be required in accordance with policy CS19 of the Core Strategy.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Although this site is not being proposed for allocation, the developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

4. Ecology

Consultation comments:

- No ecological or environmental studies – there would be a loss of habitat for wildlife on the site (e.g. badgers, bats etc), potential impact to TPOs on the northern boundary, and threat to boundary hedges if the road is to be widened
- Close proximity to Local Wildlife Sites. Avoid or mitigate indirect impacts on Local Wildlife Sites.
- The Newbury Town Design Plan states that Speen Moors are the "green lungs" of the area.

Council Response

All sites have been subject to consultation with the Council's ecologist. No significant concerns have been raised in relation to this site. An extended Phase 1 Habitat Survey would be required to be undertaken if a planning application was to come forward on the site, although the site is not being proposed for allocation.

It is acknowledged that there are TPO protected trees on the northern boundary and a suitable root protection buffer would likely be required as part of the development of the site. However, trees protected by TPOs can be removed, with prior approval from the Council. Usually permission is approved subject to alternative planting being provided on the site.

It is accepted that there are Local Wildlife Sites (LWSs) in reasonably close proximity (not adjacent) to the site, however it is not considered that development of the site would have a significant impact on the LWS or semi-natural ancient woodland.

It is accepted that building on greenfield land could potentially reduce green infrastructure, however development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. Green Infrastructure, including public open space and landscaping, will be required in accordance with policy CS19 of the Core Strategy. The site is not however, being proposed for allocation.

5. Infrastructure

Consultation comments:

- The development would add pressure on amenities and infrastructure which are already struggling (esp. Doctors and School)
- Local schools are at capacity, where will the children from the development go to school?
- The site should be connected to the mains sewer. Any improvements to the sewerage network to provide adequate capacity should be in place prior to occupation of dwellings.

Council Response

The Infrastructure Delivery Plan of the Core Strategy considered the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Although this site is not being proposed for allocation, development of any site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services) could be sought through the CIL.

Consultation has taken place with Thames Water. Thames Water has indicated that it has no concerns over infrastructure for water supply or wastewater services.

6. Site planning history

Consultation comments:

- Previously rejected Local Plan site – the same issues still stand

Council Response

This site is not being proposed for allocation, however the sites which are being put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy.

7. Alternative sites

Consultation comments:

- Greenfield
- Use brownfield sites and empty buildings
- Not consistent with the Quality Design SPD Area Design Focus – Speen Lane
- The site description is misleading as it suggests a brownfield site and a different parcel of land

Council Response

This site is not being proposed for allocation, however the sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (including brownfield sites) have a presumption in favour of development and therefore, do not need to be allocated.

The impact on the landscape and landscape character of the area would be a key consideration in the determination of any planning application. Policy CS19 focuses on the protection of the historic environment and landscape character. Additionally, In line with CS14 of the Core Strategy and the Quality Design SPD any scheme would need to be designed to respect and enhance the character and appearance of the area.

8. Consultation

Consultation comments:

- Poor consultation (no one was notified at SHLAA stage. 6 weeks over the summer holidays. Letters only sent out to those within 100m of the site). Some also commented on a lack of a planning application site notice.

Council Response

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation. There is no requirement to send direct letters or to put up a site notice (a site notice is required at a planning application stage; however letters were sent to residents to ensure that they were aware. There were also a number of other forms of communication.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

9. Comments from Speen Parish Council (SPC):

SPC did not comment on the proposed site as it is just outside the parish boundary. SPC was not consulted prior to the site being identified as a preferred site.

The site has been previously rejected by WBC after the Local Plan Inspector recommended allocation, one of the main reasons being access. Reference was made to the gradient and the existing rat running issue which would be made worse. At a public meeting TW were unable to identify what had since changed to make the site more acceptable. The proposed density appears to contravene WBC policy for a suburban area of no more than 30 dph. The site is within a water protection regime. Major aquifer on site, the area surrounding an aquifer should not be built on, and this is thought to be 400m from the borehole which covers most of the site. No school places available. Hill Rd would need widening, be adopted and pavements added. Speen Ln/Old Bath Rd junction may need alteration. Speen Ln is narrow, no pavements for much of its length. Visibility from properties and side roads on to Speen Ln is extremely restricted at times. The road is also used by walkers with dogs and/or children, runners and cyclists etc. Lambourn Way crosses the Lane. Any improvements either end of Speen Lane would compromise the Obelisk and War Memorial. Building on this site and NEW042 would significantly compound the problem. Landowner has not provided a highway solution to the concerns of the highways authority in relation to access to the site. A recent survey shows that

between 8am-9am there are 91 car movements and evening rush hour there are 90. Pedestrian access to Newbury is good, but half the car movements are expected to go towards A34. Clarification needed on the bus services, supposedly two bus routes but the public meeting could only identify route 4 (a 2 hourly service which finishes early evening). Site has links to the 2nd Battle of Newbury which was fought over this land. The public meeting was not satisfied that sufficient information or acceptable answers had been given to the problems of surface water, water supply and drainage on the site.

Council Response

The comments regarding the access are noted. It is the Council's position that access could be obtained via Hill Road; however Hill Road would need to be widened and adopted as a public highway. A footway would also be required to connect the site to existing footways along Speen Lane. Sight lines onto Speen Lane are limited however, and are therefore a concern, as is the gradient up to Speen Lane.

The site promoter has been unable to demonstrate the ability to achieve suitable sightlines and to construct a pedestrian route. For these reasons the site is not being proposed to be taken forward for allocation.

Detailed modelling is not currently available for this site; however in the event that a planning application came forward it would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users. As has been stated above the site is not being proposed to be taken forward for allocation.

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. As has been stated above the site is not being proposed to be taken forward for allocation.

The EA has indicated that 10% of the site is underlain by major aquifer, and that the site is within a Source Protection Zone (SPZ3) although the EA has no in principle objections to development in SPZs. In the event that a planning application came forward, where necessary, evidence would need to be provided to show that the risk of contamination could be satisfactorily mitigated. The site is however, not proposed to be taken forward for allocation.

Comments regarding the impacts on the Obelisk and War Memorial are noted. One of the Core Strategy strategic objectives states 'to ensure that development is

planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside and this approach is taken forward in policy CS19. Development would need to take into account the historic character of the area. This would be considered at planning application stage.

Comments regarding the cumulative impact of the development of this site and NEW042 are noted. This site is not being proposed for allocation while NEW042 is being proposed for allocation.

The site is in Flood Zone 1, within an area of groundwater and surface water flood risk although there is no evidence that the site has flooded. An FRA would be required and appropriate mitigation including SUDs provided in the event that planning application came forward. The site is however, not proposed to be taken forward for allocation.

10. Comments from Newbury Town Council:

Concern that the drainage needs of the site have not been sufficiently considered. The site contains an aquifer. Concern that the traffic aspects require much further consideration. Speen Lane is very narrow in parts and is often overloaded, and the spaces intended for local parking and passing are being abused.

The site is in Flood Zone 1, within an area of groundwater and surface water flood risk although there is no evidence that the site has flooded. An FRA would be required and appropriate mitigation including SUDs provided in the event that planning application came forward. The site is however, not being proposed to be taken forward for allocation.

The EA has indicated that 10% of the site is underlain by major aquifer, and that the site is within a Source Protection Zone (SPZ3) although the EA has no in principle objections to development in SPZs. In the event that a planning application came forward, where necessary, evidence would need to be provided to show that the risk of contamination could be satisfactorily mitigated. The site is however, not being proposed to be taken forward for allocation.

It is acknowledged that Speen Lane is very narrow in places.

It is the Council's position that access could be obtained via Hill Road; however Hill Road would need to be widened and adopted as a public highway. A footway would also be required to connect the site to existing footways along Speen Lane. Sight lines onto Speen Lane are limited however, and are therefore a concern, as is the gradient up to Speen Lane.

The site promoter has been unable to demonstrate the ability to achieve suitable sightlines and the construction of a pedestrian route. For these reasons the site is not being proposed to be taken forward for allocation.

Detailed modelling is not currently available for this site; however in the event that a planning application came forward it would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users. As has been stated above the site is not being proposed to be taken forward for allocation.

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. As has been stated above the site is not proposed to be taken forward for allocation.

11. Comments from Croft Lane Residents Association:

Site is not needed to meet housing numbers; other less constrained sites; impact on landscape and visual amenity; potential overdevelopment would be out of keeping with local character and development plan; poor access; risk of groundwater contamination; no ecological or archaeological studies. Subsequent permissions now contribute to housing requirement. Previously rejected Local Plan site with access, and subsequently land ownership, issues. Take the Newbury Town Centre Design Statement and Speen Village Design Statement in to account.

Council Response

Although the site is not being proposed for allocation, it is considered to be in an area of medium/high landscape sensitivity. Any scheme that came forward would need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open space and landscaping, would be required in accordance with policy CS19 of the Core Strategy.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

It is the Council's position that access could be obtained via Hill Road; however Hill Road would need to be widened and adopted as a public highway. A footway would also be required to connect the site to existing footways along Speen Lane. Sight lines onto Speen Lane are limited however, and are therefore a concern, as is the gradient up to Speen Lane.

The site promoter has been unable to demonstrate the ability to achieve suitable sightlines and the construction of a pedestrian route. For these reasons the site is not being proposed to be taken forward for allocation.

Detailed modelling is not currently available for this site; however in the event that a planning application came forward it would be necessary for a specific Transport Statement (TS) / Transport Assessment (TA) to be produced which would consider the impact on all the local road junctions around the site, and public transport. Policy CS 13 states that development that generates a transport impact will be required to, inter alia, improve travel choice and facilitate sustainable travel. Particular focus would be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users. As has been stated above the site is not being proposed to be taken forward for allocation.

The EA has indicated that 10% of the site is underlain by a major aquifer, and that the site is within a Source Protection Zone (SPZ3) although the EA has no in principle objections to development in SPZs. In the event that a planning application came forward, where necessary, evidence would need to be provided to show that the risk of contamination could be satisfactorily mitigated. The site is however, not being proposed to be taken forward for allocation.

All sites have been subject to consultation with the Council's ecologist. No significant concerns have been raised in relation to this site. An extended Phase 1 Habitat Survey would be required to be undertaken if a planning application was to come forward on the site, although the site is not being proposed for allocation. An archaeological assessment is unlikely to be required for this site.

Existing committed development has also been taken into account when calculating the remaining requirement for allocation through the DPD. In Newbury a number of sites have been put forward as options for development. It is not the Council's intention to allocate all of these sites and the purpose of the preferred options consultation was to gain additional information to finalise which options to take forward.

Comments regarding the Newbury Town Centre Design Statement and Speen Village Design Statement are acknowledged.

12. Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)

Consultation comments:

- There are inconsistencies in the SA/SEA for example, there is a high risk of groundwater contamination but the SA/SEA says there is unlikely to be an impact on water quality. Incorrect to say that development is "unlikely to have an impact on the character of the landscape" when building 40 houses at double the density of the area on Greenfield land which is used for the enjoyment of local residents.

Council Response

The Council is required to undertake assessment to consider the impact of development on sustainability through the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process. This considers the impact of development on environmental, social and economic factors and where a significant negative impact is shown a site has not been recommended for allocation. All of the sites are assessed on a consistent basis.

The Housing Site Allocations DPD will be subject to a second period of consultation and following this it will be submitted to the Secretary of State for examination. The Examination process provides an independent review of whether all proposals in the plan are based on sound evidence, which will include a review of the Council's evidence on flooding, traffic etc.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

13. Comments from the site promoter:

Vehicular access is from Hill Road via Speen Lane. Pedestrian and cycle access to the site from the town centre can also be achieved via Northcroft Lane, making the site an approximate 10 minute walk from the town centre. The site is located within a predominantly residential area with good access to the services and facilities located in Newbury Town Centre, as well as open space and leisure facilities at Goldwell Park and Northcroft Leisure Centre. Agree with the Council's assessment that a development of approximately 40 dwellings could be achieved on the site which would incorporate a mix of dwellings types and sizes. Hill Road is approximately 3.4m wide and already provides access, including HGVs, to the Thames Water depot. It would be desirable to widen the road and Thames Water Utilities Ltd own the eastern side of Hill Road and the land to the south west of Hill Road. A suitable road widening scheme is possible if development is permitted on this site.

Council Response

Comments are noted

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Newbury General Comments

Responses received: 2

NEW110: London Road Industrial Estate

Consultation comments:

- Sport England object to the inclusion of Newbury Football Club within the site. The playing field and sports facility needs to be allocated elsewhere for its re-provision and the developer of the site should fund this re-provision in accordance with para 74 of the NPPF and Sport England's playing fields policy

Council response

The site has not been put forward for allocation at this time due to a number of issues, including the need to provide the football club elsewhere which affects the current deliverability. The site is currently against planning policy as a site for residential development as it is within a protected employment area. A review of protected employment area will take place as part of the new Local Plan, it is at this stage that the site may be allocated (however, sites within settlement boundaries are not generally allocated).

Consultation comments:

- This site, and Turnpike Industrial estate are excluded from the DPD on the grounds that the Council has failed to update the Employment Land Assessment
- The ELA was adopted in 2007 and is woefully out of date. Evidence should be up to date – therefore, less than 5 years old
- The Council's approach to PEL is inconsistent – some sites are approved, others refused.
- The process to review PEA has stalled and appears to have been suspended until the preparation of the Local Plan
- The Council's application for funding for the new access (A339/Fleming Road) is predicted on housing delivery within the plan period, and funding must be spent by March 2016
- The Council is failing to comply with para 22 of the NPPF and it is inappropriate to complete the DPD without a review of PEAs
- If all PEAs are not to be reviewed LRIE and Turnpike Industrial Estate should be allocated in the DPD

Council response

The Council will be updating the Employment Land Assessment as part of the new Local Plan. This work has been commissioned, together with a Functional Economic Market Area (FEMA) study. The work needed to wait for the outcome of the Strategic Housing Market Assessment (SHMA) which gives a longer term housing number for the District. This will, in turn influence future employment demand, The Housing Site Allocations DPD is focusing on the allocation of housing, therefore, other policy designations are not being considered at this stage, these will be done as part of the new Local Plan which will consider all policy areas and replace the Core Strategy. Currently development of the site for residential development is contrary to policy as the site is a protected employment area.

Each planning application is considered on its merits, with planning policy the starting point, and other material considerations taken into account.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Newbury Rejected Sites

NEW001: Land East of Long Lane

Responses received: 3

Consultation comments:

- Support rejection of this site

Flood Risk

Consultation comments:

- Good to see the flood risk of the area is being properly taken into account

Historic Environment

Consultation comments:

- English Heritage welcomes the rejection of this site as it lies within the possible area of the 2nd battle of Newbury

Council response

Comments noted. The site is not being put forward for allocation.

NEW010: Land West of Long Lane

Responses received: 3

Consultation comments:

- Support rejection of this site

Highways and transport

Consultation comments:

- Traffic impact on Love Lane, and impact on road safety linked with the three schools located along Love Lane

Flood Risk

Consultation comments:

- Good to see the flood risk of the area is being properly taken into account

Council response

Comments noted. The site is not being put forward for allocation.

Comments from the site promoter

- The site should be allocated for development to ensure the Council can meet their housing requirement
- The site could accommodate 127 dwellings
- Close to services and facilities, available, no indication that the site would not be viable, development would be dependent on allocation through the DPD or settlement boundary review. Archaeological and flooding constraints need further assessment
- The site has been rejected due to flood risk and possible impact on area of 2nd battle of Newbury
 - Flood risk
 - The site is within FZ1 – the lowest designation of flood risk set by the EA
 - Additional land to the north (1.5ha) is available to assist with incorporating flood alleviation measures into the design of the development
 - Flood mitigation measures and SUDs would be incorporated into the development scheme

- The site should not be dismissed because of a ‘possible’ flooding issue – these issues can be mitigated by an FRA and SUDs
 - Archaeology
 - There is evidence that the 2nd battle of Newbury centred on Donnington Castle and Speen Village (1500m to the west of the site)
 - Long Lane was used by Parliamentarians as part of the a route to encircle the Royalist forces at Speen, there is no evidence that the site formed part of the battlefield
- Other issues raised in the SA/SEA can be mitigated
 - ROW along western boundary can be preserved and maintained
 - The site would not result in loss of productive agricultural land as the site has limited stand-alone agricultural value
 - Development could fund improvements to schools
 - Air and noise surveys would be carried out regarding the proximity to the B4009
- Key elements of the proposed scheme:
 - Primary and secondary access off Long Lane
 - New cycle/foot ways along Long Lane retaining/relocating existing hedgerows where possible
 - Links from site to existing ROW to the west
 - Public open space, including children’s play area to be provided in the centre of the site
 - Additional land to the north of the site to provide a transition from urban to rural character and potential flood alleviation
 - Existing tree belt along western edge to be retained and enhanced
 - Developable area of 4.23ha
- The site is suitable, available and achievable and could be developed in the next 5 years, individually or as part of a larger combined site
- Request that the site is an additional allocation in the DPD
- The current plan is unsound, because it is not consistent with the NPPF as it does not meet OAN and boost housing supply. Additional sites need to be added for the plan to be positively prepared, justified and effective

Council response

The allocation of sites through the DPD will boost the supply of housing in the short to medium term, in accordance with the NPPF. The Council will be allocating sites to provide a degree of flexibility and contingency over and above the 10,500 housing requirement figure of the Core Strategy to take into account the likelihood of a higher housing requirement in the Berkshire SHMA. A Local Plan to look to the longer term, including the longer term housing requirement, will be commenced after the adoption of the DPD.

While the site is within flood zone 1, there are significant surface water flooding issues to the north east of the site. During January/February 2014 runoff from the site resulted in

partial closure of Long Lane. Significant flood risk management and SUDs would be required and while it is noted that land to the north east of the site would be provided as flood alleviation, sequentially, where sites are available without a risk of flooding these should be considered first. There are a number of other sites in Newbury that do not have this level of flood risk, and therefore, they are considered more appropriate for allocation.

Archaeology comments are noted. The Council's archaeologist has been consulted on the site and recommended that further investigation of the site takes place, as other finds within the local area suggest some potential on the site. As a minimum a desk based study would be required. Heritage England have commented to say that NEW001 is likely to be within the second battle of Newbury site, therefore, given the proximity of the sites to each other it is likely that this site is also within the 2nd battlefield area.

The comments on the SA/SEA are noted. All sites are assessed using the red outline only to ensure consistency across all sites. Where mitigation measures are proposed they are listed in the mitigation section of the SA/SEA, but they do not change the overall score for the site.

The proposals set out for the site are noted.

NEW019: Land at Garden Close Lane, Newbury

Responses received: 1

Comments directed at development to the north of Newbury, specifically NEW031A/B, therefore, not relevant to this site

NEW031A&B: North Newbury

Responses received: 13

Consultation comments:

- Support rejection of the site

Development Potential

- This is likely to be phase 1 of a much larger development - this would not deliver the required infrastructure improvements
- Set precedent for infilling to take place all the way to the M4 and loss of boundary between motorway and town
- Site would not create community as would be split by A339
- Smaller sites, as proposed have less impact on the environment and are better integrated into the community
- Major impact on the community living in Shaw
- The site has been rejected twice before and still a planning application has been submitted
- Allocation of this site would go against the good work already done in putting together the DPD
- Housing is better provided on smaller brownfield sites closer to amenities and with less impact (traffic/school/local facilities)
- It is disheartening that developers are able to stall projects (e.g. Sandleford) and resubmit plans in order to achieve their objectives (this site)
- The DPD is a robust rebuttal but there is still wriggle for – SB reviews
- The Council needs to consider sustainable, positive and cohesive growth – the DPD goes part of the way to doing this
- Extending the settlement boundary sets a dangerous precedent
- This development is not needed
- Development would result in urban sprawl of Donnington
- Destroy character, beauty and community feel of the area
- Precedent for future development on the site leading to disjointed development without the infrastructure to support it

Land Use

- The site is Greenfield

Highways and transport

- Traffic impact on the A339 and Vodafone roundabout
- Traffic on the A339 already encourages rat running through surrounding roads – likely to get worse
- Traffic impact on the Robin hood roundabout/Oxford Road/Love Lane
- A339 already experiences queuing, especially if the A34/M4 are closed or congested
- Traffic impact – can already take 40min to cross Newbury
- Unsustainable to split the site by the A339
- Poor links across the A339
- Increase traffic on Love Lane
 - Already has traffic calming and a zebra crossing
- A339 has a health and safety impact
- All local services/facilities need road access which adds more pressure
- Newbury needs a ring road

Landscape/Setting

- The site is unsuitable for development as it is in an area of natural beauty
- Would damage the green gateway into Newbury
- Impact on the AONB
- Development would double the size of Shaw-cum-Donnington and Donnington village
- Loss of Donnington's Identity
- No integration into the existing parish
- Development of the site would make Newbury less appealing

Infrastructure

- There are no facilities to support such a development (schools, doctors, shops)
- No discernible amenities in Shaw-cum-Donnington
- Love lane is the heart of the community with 3 schools, and the village hall – there are no alternative routes to these facilities
- Developers do not build long term benefits for the community

Flood Risk

- Site experiences regular flooding – the right of way linking the two sites of the site is regularly flooded after heavy rain, especially in winter
- Vodafone experienced significant flooding in 2007
- Flooding
- Developers will not keep promises to solve the water issues on the site by building on an area that floods

- Existing properties will become more vulnerable to flooding
- There has been a lack of investment in flood defences in the area

Economy

- Impact on Vodafone – could encourage them to move out of Newbury, impact on jobs and the local economy

Historic Environment

- Loss of local historical significance

Council Response:

Comments are noted. The site was not included as a preferred option within the DPD, and it is not proposed for allocation. A planning application has been received for the site, but this is considered separately to the DPD. The application is contrary to policy and there are a number of issues to be overcome, therefore, the application is likely to be refused.

Comments from the site promoter:

- The site has been rejected by the Council for inclusion in the DPD – many of the reasons for rejection are considered unsound and not supported by robust evidence
- An EIA has been carried out and provides all the info needed for the site to be allocated
- The council have not given any definition of a ‘strategic site’ – there does not appear to be a max. Size restriction within the site selection process.
- The site is considerably smaller than either of the Core Strategy allocated sites
- If a site is suitable for development it should be considered no matter what size it is
- While the site was not allocated in the Core Strategy there were no ‘showstoppers’ to its development
- The main concerns relating to the site are Highways and Flooding – both of these can be mitigated
- Development can and would be phased – the council could assess the whole site as suitable but only propose a first phase to come forward in this plan period
- The current planning application for 401 dwellings, plus land for a primary school is a logical, non-strategic first phase that could be supported by the DPD
- The Council have considered parts of sites in other areas (e.g. NEW047D)
- It is our view that the whole site is required to meet the ‘interim’ Core Strategy housing requirement
- Flooding
 - A FRA accompanies the planning application
 - SUDs are proposed
 - Surface water runoff can be maintained at existing Greenfield runoff rates

- With mitigation for flood risk and pollution control, the impact of the development would be negligible
- Even with some previous flooding on the site development could take place without any adverse impact from flooding
- Flooding should be removed as a key reason for rejection
- Highways/Sustainable Travel
 - The A339 and access from the Vodafone roundabout have been raised as issues
 - This is covered in the EIA and shown to have a negligible impact with a minor negative impact on The Connection (driver and pedestrian delays)
 - An enhanced bus service would be provided, potentially using the Vodafone buses
 - Satisfactory walking/cycling routes into the town centre could be provided
 - The subway between the two sites of the site would be improved
 - The SA/SEA gives an uncertain impact for sustainable travel, this should be changed to a positive
- Landscape
 - Inevitably development of Greenfield sites will lead to some level of adverse impact on the landscape
 - An LVIA and EIA have considered the impact on the landscape and incorporate a range of measures to mitigate and minimise the effects
 - The development includes significant areas of open space containing circular walks and recreation routes linking the development to the surrounding countryside
 - Locally significant adverse effects are limited to the loss of agricultural land and the legibility of the contrasting wooded edge at High Wood and Brickkiln Wood
 - Visual effects are limited to views from residential properties adjacent and overlooking the site – edge treatment (hedgerow/tree planting, setting buildings back from existing properties) will lessen the impact
 - Wider cross-valley views will be maintained by setting the development below the adjacent slopes
- Heritage Assets
 - The site is within the 2nd battle of Newbury site
 - Assessment of the site has taken place – both desk based and through field walking and trench evaluation
 - There may be archaeological remains associated with prehistoric activity and a small area associated with the 2nd battle of Newbury
 - Further work would be required as development is carried out – although archaeological remains would be removed, they would be preserved by record
 - Development would not affect the majority of designated heritage assets (Donnington Castle, Snelsmore House, Shaw House)
- Ecology and Nature Conservation
 - The site comprises intensively farmed habitats of low value

- The site is adjacent to 2 ancient woodlands, both of which are LWS. No public access would be given to the woodland and sufficient buffers/fencing provided
- Potential for increased use of the SSSI
- Green Infrastructure on the site would be provided to encourage dog walkers to stay away from the SSSI
- Potential to fund a part-time warden (during bird nesting season) in perpetuity
- Water quality would not be affected – again potential to fund a part time position to work to improve river morphology and raise community awareness
- Impacts are outweighed by the benefits of the development
- The SA/SEA should be updated as a result
- Environmental Health
 - No significant evidence of contamination
 - No evidence of groundwater contamination
 - Air quality is not a constraint to development
 - Appropriate glazing/ventilation provided to reduce noise levels
- Education
 - Primary school capacity in Newbury is an issue
 - Part of the site is to be safeguarded for a school
 - SA/SEA should be updated to give a + for improving access to education, employment and services
- The site could be seen as two parcels of land, but the underpass provides the opportunity to link both parcels in a comprehensive manner
- The EIA shows that all negative impacts can be mitigated and that there will be an overall positive impact as a result of development on the site
- Therefore, the site should be allocated

Council Response

The Core Strategy sets out the spatial strategy for development across West Berkshire. It states that following the allocation of the two strategic sites in Newbury (as part of the Core Strategy) that smaller sites will be allocated across the settlement hierarchy through the Housing Site Allocations DPD. Development of this scale is not considered appropriate for allocation at this stage and would need to be considered through the new Local Plan. The Council have significant concerns regarding highways and flooding on the site, which while there may be mitigation solutions available, could impact on deliverability of the site in the short term. There are other sites across the district that do not have such issues and therefore, could come forward for development immediately.

The Council are aware that the site promoter wishes to develop the whole site over time. Where parts of sites have been considered elsewhere in the DPD the Council consider that this 'developable area' is the only part of the site that is appropriate for development, with no opportunity for further development in the future.

The Council maintains concern over flood risk on the site, especially the impact that flooding could have on the underpass. The solution offered as part of the planning

application would prevent a public transport link between the two parts of the site, which would not lead to cohesive development and does not allow for emergency access to the eastern part of the site.

While access to the site can be achieved from the A339, it is not considered that this is a particularly suitable main access route. This route is often congested in the morning and evening peak and it provides a significant barrier between the two sides of the site, with the only link between the two parts of the site being via the underpass mentioned above. There are a number of issues in relation to the use of the underpass to create a cohesive development. As referred to above the underpass is subject to flooding, and the proposed mitigation would prevent any public transport links between the two sites. There are limited walking and cycling routes from the site into the Town Centre.

It is noted that a Landscape and Visual Impact Assessment (LVIA) and Environmental Impact Assessment (EIA) have been submitted as part of the planning application. It is also noted that further archaeological work is proposed to be carried out should the site be allocated, or receive planning permission and that ecological mitigation measures have been proposed.

Education provision across Newbury is likely to be resolved through the provision of three new schools in southern Newbury, one at Newbury College (to meet existing demand, including the allocation of smaller sites through the DPD) and two on Sandford Park (to meet demand from the development). This does not mean that future provision in northern Newbury would not be required, but it is not considered critical at this time.

The SA/SEA assesses all sites on a consistent basis, using the red line only. Mitigation measures are taken into account, but do not change the overall score.

NEW047: South East Newbury

Responses received: 1

Comments from the site promoter

- Rivar Ltd and David Wilson Homes own or have a controlling interest in more than 50ha of undeveloped land to the south east of Newbury
- This is a unique opportunity to develop a comprehensive development of approx. 350 dwellings that will secure major community benefits
- Development would provide an opportunity to reassess the function of the former Gap policy between Newbury and Greenham
- Green Infrastructure and Public open space will be provided (31ha)
- A number of biodiversity improvements are proposed
- Sufficient weight is not being given to the benefit of comprehensive development in this area

Council response

Comments noted. Further consideration of a wider area of this site has taken place following the preferred options consultation and it is now felt to have wider development potential as a phased and comprehensive development.

NEW047A: Land to the south of New Road

Consultation comments:

- The site is currently assessed in the SHLAA as Not Currently Developable – reasons can be mitigated (Impact on ancient woodland)
- The site is visually and physically contained
- Access would be from New Road
- Ecological constraints do not put a barrier on development - Impact on ancient woodland can be mitigated
 - Buffers provided
 - New habitat creation
 - Manage access to the LWS
 - Provision of receptor sites for reptiles and Great Crested Newts
 - Sensitive lighting provided for bats

Council response

The site is assessed as Not Currently Developable due to the site area/orientation remaining when the required buffers to the ancient woodland are considered. While mitigation measures can be provided to the ancient woodland the remaining developable area is small, and would result in linear development, which is not considered to be in keeping with the surrounding area.

NEW047B: Land north of Drayton's View

Consultation comments

- All reasons for rejecting the site for allocation can be overcome
- This site represents a rounding off opportunity
- Views to the north provide the opportunity for a network of open space, foot and cycle ways
- Similar mitigation as area A would be provided for the ancient woodland
- Landscape and development strategy carried out
 - Key views would restrict the developable area to more elevated land, which has a strong relationship with the existing residential development
 - Retention and reinforcement of the hedgerow to the south
 - Restriction of development to the west to maintain open space between the site and woodland
 - Creation of enhanced treed setting to settlement edge – inc. wooded copse to boundary with New Road and retaining the group of mature trees to the west
- Capacity of the site reduced to approx. 33 dwellings
- There are no other constraints to justify exclusion of the site from allocation

Council Response

Comments noted.

The principle of development is considered acceptable on the site and it is now included as a proposed allocation.

The areas outside the developable area would need to be retained in perpetuity as public open space, and ownership passed to the Local Authority.

NEW047C: Land to the east of Greenham Road

Consultation comments:

- All reasons for rejecting the site for allocation can be overcome
- Development is restricted to below the 120m contour line and bounded to the east by woodland and rising ground to the south
- Approx 65 dwellings.
- Would be a logical extension should area B be developed
- Provides (with area B) opportunities for a continuous network of public open space, foot and cycle ways
- Landscape and Development Strategy carried out
 - Development on the lower slopes – well related to existing residential development
 - Set back from north/north west boundary to secure open space corridor and retain the right of way
 - Development would secure a permeable form of development that links to open space to the south
 - Extension of vegetated area
 - Retention of a large area of open space between Newbury and Greenham
 - Package of ecological measures
 - Retention of trees
 - Buffers
 - Management of access to West Wood
 - Potential creation of reptile/GCN receptor sites in open space
- No other constraints identified

Council response

Comments noted.

The principle of development is considered acceptable on the site and it is now a proposed allocation to form part of a comprehensive development in this location.

The revised site area does not appear to take into account the ancient woodland. Appropriate buffers would need to be provided, which may further reduce the developable area of the site. The areas outside the developable area would need to be retained in perpetuity as public open space, and ownership passed to the Local Authority.

NEW057: Land to the East of Capability Way

Responses received: 1

Comments from the site promoter

- Access can be achieved from Capability Way, with a bridge across the wetland
- Development would include new foot/cycle ways
- This site has the highest ecological interest of all sites due to the proximity to the SSI and GCN breeding site
 - A comprehensive package of mitigation, compensation and enhancement would take place including the retention of marshy habitat, management of are for GCNs and reptiles, SUDs, bat roosts, buffer zones and sensitive lighting
- Landscaping and development strategy proposes retention and reinforcement of perimeter trees and woodland
 - Extension of woodland clover and enhanced landscaping of the setting
 - Reinforced landscape boundary to Pinchington Lane
- Creation of footpath between Pinchington Lane and Greenham Common
- Reinforcement of South eastern boundary
- No other constraints for development

Council response

The site is included within an area designated as historic park and garden. This whole area of Historic Park and Garden is included on Historic England's "Heritage at Risk" Register due to the pressure from development, and the amount of development hat has already taken place on Historic Park and Garden land in this area.

Allocation of this site would result in a standing objection from Heritage England, which would not be able to be overcome.

NEW103: Sanfoin/Sanfoin Cottage

Responses received: 1

Comments from the site promoter:

- Object to rejection of the site
- The site should be included within the settlement boundary
- The site is in single ownership
- Sandleford Park will have a substantial urbanising effect on the character of the area
- The site is accessed via 2 private drives and could serve 5 dwellings (the number allowed by Highways for private drives)
- There are no known constraints to development – the main constraint is the access, which a development of 5 dwellings, would be acceptable
- Meets the Settlement Boundary criteria
 - Adjacent to settlement boundary, long established area of housing
 - Would be odd if not included in Settlement Boundary if Sandleford is within
 - The site has clear existing curtilage/boundaries

Council response

It is noted that the site is now proposed for 5 dwellings due to the access being via private drive. The site will be considered as part of the Settlement Boundary review associated with Sandleford Park.

NEW105: Land at Yates Copse

Responses received: 2

Consultation comments:

- Agree the site is not developable
- Loss of valued views across the valley
- Site access is too narrow and unlikely to support an access road and flood measures without impacting on Yates Copse
- Adjacent to Ancient woodland
- Surface water flood risk to neighbouring properties
- Lack of public transport would mean car dependency
- Additional information submitted by the Parish Council on 7th March 2014 was not included in the published consultation documents.
- Parish Council requested changes to the Site Assessment forms in relation to narrow access, flood mitigation measures, steeply sloping site, car dependency due to lack of public transport and additional traffic on an already busy network (see submission for details – hsapo5559)

Council response

It is acknowledged that the site is adjacent to Ancient Woodland. Should the site be developed appropriate buffers (15m) would need to be provided. The site promoter has suggested that only Area A of the site (the southernmost part of the site) be allocated for development of 10 dwellings. This part of the site is adjacent to existing development, and located within the current settlement boundary. This part of the site would be unlikely to impact on views across the valley, as it is at the lowest point of the site. There is concern that the required buffer to the ancient woodland (15m), and the required road widths for an adoptable access road would leave little space for development on this part of the site.

The site is located immediately to the north of a critical drainage area. Flooding in this area is a significant concern, and should any development go ahead in the area Greenfield run off rates would need to be retained. Substantial flood mitigation would be required on the site.

It is noted that there are limited public transport services passing the site, however, there are number stops along Shaw Road, Fir Tree Lane and the A4. The site is 2.3km from Newbury Racecourse Railway Station.

We have checked the submission made by the Parish Council on 7th March and can confirm that the information contained in Annexes B, C and D was included in the Consultation Statement. Annex A was omitted through and we apologise for this. Appendix

2 of the Consultation Statement submitted to the Secretary of State will therefore be updated to include this. Assurances can be given though that the information contained in Annex A was taken into consideration as part of the site selection process.

Comments from the site promoter:

- 2012 SHLAA the Council said that there was some potential on the site
- The site is subdivided into 4 areas – the southern areas have a lower impact on the landscape/character of the area than the northern sites
- The northern areas of the site left as recreation space
- The site should be reassessed using the smaller developable area, especially as NEW045 has been allocated
 - Area A – 10 dwellings
 - Area B – could be included if necessary – would provide an additional access to NEW045
- Smaller area would reduce concerns over size and impact on the rural character of the area and other concerns of the Council
- No objections raised by Highways in relation to access
- TA will be required and produced to accompany a planning application
- Single land ownership
- Flooding
 - Site area potentially effected by surface water flooding
 - No further information available on the adjacent critical drainage area
 - An FRA and mitigation can be provided with a planning application
 - Previous flooding on the site was due to blocked culvert
- Ecology
 - Adjacent Ancient woodland/LWS – buffers would be provided
 - Development would not adversely impact Yates Copse
- The site performs well in many respects

Council response

The SHLAA assessed the site as Potentially Developable. All potentially developable sites were then taken through the Site Assessment process and considered for allocation through the DPD. The Site Assessment process considered a wide range of factors to assess which of the SHLAA sites would be most suitable for allocation through the DPD.

It is noted that the site has been split into four different areas, with the southern two areas being lower down the hill and therefore, likely to have less of an impact on the landscape.

The revised proposals for the site are noted. Area A is within the existing settlement boundary, and therefore, would not need to be allocated for development. There is concern regarding this part of the site given the requirement for 15m buffers to the ancient woodland

and the need to provide an adoptable standard road, especially if access was to be provided to NEW045 (Area B). The developable area of Area A, is 0.16ha, at a density of 30dph this gives a development potential of 5 dwellings. Adequate access can be provided to NEW045 without the need for access from this site.

Flood risk on, and around, the site, is a significant concern, as the site is located immediately to the north of a critical drainage area, and many of the properties to the south and south east of the site have suffered significant flooding in recent years. Should any development go ahead in the area Greenfield run off rates would need to be retained and substantial flood mitigation would be required on the site, which could impact on viability. It appears that there is a natural attenuation pond on part of the site.

NEW121/121A/122: Land at Donnington Valley Golf Course/Northing Hill

Responses received: 1

Comments from the site promoter:

- NEW031 was a shortlisted site, and although not taken forward as a preferred option must have had some merit
- Consideration should have been given to other potential development sites immediately north of Newbury (at Donnington) to consider the benefits and impacts of a smaller scale development more in keeping with the existing scale and form of the village.
- **NEW121A** (Land south of Donnington Valley Golf Club)
 - The site should be included within the settlement boundary
 - Donnington is a small village, with a settlement boundary where small scale infill development is acceptable in principle
 - Development would infill the area between the village and the hotel
 - The site is currently used as an informal overflow car park for the golf club
 - 1.3ha – approximately 15 dwellings
 - No specific site constraints
 - Provides an opportunity to deliver sensitive residential development with a range of house types and sizes, creating a logical extension to the existing built form
 - Buffer planting, including existing trees along the boundaries would screen the dwellings minimising the visual impact and retaining the green gateway into Donnington and Newbury.
- **NEW121** (Donnington Valley Golf Club)
 - 47ha
 - Currently used as a hotel and golf course with associated club house and residential properties.
 - There is a BOA and TPOs to the north west of the site
 - Longer term opportunity to deliver new homes in a parkland setting, with significant scope for the provision of accessible open space along with a range of leisure and community facilities
- **NEW122** (Northing Hill)
 - 3.72ha – capacity for 50 – 75 dwellings
 - The site is surrounded by residential development
 - The site lies within a BOA – ecological mitigation and enhancement would significantly reduce the impact of development

Council response

The sites are to the north of Donnington. The Housing Site Allocations DPD is only considering sites adjacent to settlements included within the Settlement Hierarchy as set

out in the Core Strategy. Donnington is not within the settlement hierarchy and therefore, allocation of the sites would not be in accordance with the Core Strategy spatial strategy.

RUR193: Land at Wash Water

Responses received: 1

Comments from the site promoter:

- The site should be allocated
- On a straight road
- Good access
- No traffic lights
- 16 houses
- This is a must for the area and would help to solve the house problem
- The Council keep going for areas that are already overcrowded and a bottleneck to get out off

Council response

The Housing Site Allocations DPD is only considering sites adjacent to settlements included within the Settlement Hierarchy as set out in the Core Strategy. Wash Water is not within the settlement hierarchy and therefore, allocation of the site would not be in accordance with the Core Strategy spatial strategy.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

General comments on Thatcham

Responses received: 3

1. Flooding

Consultation comments:

- Flooding a huge issue in Thatcham.
- Many of the gardens and houses that back onto the Jubilee Lake area in Rosedale Gardens were on the brink of being flooded at the beginning of 2014.
- Flooding at the beginning of 2014 went right up to the railway line.

Council response

Comments noted.

Core Strategy DPD policy CS16 (Flooding) restricts against new development within areas of flood risk from any source of flooding unless it can be demonstrated that the location is appropriate, there are no suitable alternative sites at a lower flood risk and appropriate mitigation measures can be implemented.

On all development sites, surface water will be managed through the implementation of Sustainable Drainage Methods (SuDS).

The sites consulted on within the Housing Site Allocations DPD preferred options document were assessed as the most suitable sites for development from those identified within the Council's Strategic Housing Land Availability Assessment (SHLAA). The SHLAA methodology excluded sites that fell within the floodplain (flood zones 2 and 3).

2. Highways and transport

Consultation comments:

- If the A4 is compromised, traffic gets diverted along this road (Lower Way), if the M4 has an accident, it diverts along the A4, which also has a knock on effect along Lower Way.

Council response:

Comments noted.

All shortlisted sites within the Housing Site Allocations DPD preferred options document were subject to an initial screening by the Council's Highways Department. This provided a simple high level indication of the likely traffic

generation from each shortlisted site and highlighted potential highway issues that could impact on deliverability of the site. With regard to THA025 it was advised that the impact of additional traffic may be limited as traffic may disperse fairly equally east and west to and from the site, but this would need to be assessed by a Transport Assessment.

The Council has commissioned Transport Assessment (TA) work to assess the impact that development of the shortlisted preferred option sites would have upon the highway network. The TAs indicate that the sites themselves are unlikely to have a significant impact on the highway network, meaning that there will be limited impact on local congestion. More detailed site specific work would be required at the planning application stage taking into account the detailed proposals.

3. Infrastructure

Consultation comments:

- The Housing Site Allocations DPD in its current form will not assist with the delivery of infrastructure which the Council identifies as being important in paragraph 3.13 of the preferred options document.

Council response

The Infrastructure Delivery Plan for the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL at the planning application stage.

4. Principle of development

Consultation comments:

- Every available space in Thatcham has been filled with development.
- Few green sites left in Thatcham.
- Thatcham should take a fair/proportionate housing allocation in the plan period because there is existing infrastructure and services in place. Doing so will

reduce the impact on other towns that have over-stretched resources, eg. Hungerford.

- The Council's strategy (ADPP3) is inappropriate to ensure the full and OAHN adequately addressed. Whilst the strategy of 'modest growth' was accepted by the Inspector, he also made clear that the Council's housing targets did not reflect full and objectively assessed housing need and would require an early review of housing (Strategic Housing Market Assessment within 3 years of adoption of the Core Strategy).
- The Core Strategy Inspector made clear that because of Thatcham's status within the Urban Area additional growth within the town would need to be considered as part of the housing review. The Council recognise in the Housing Site Allocations DPD (paragraph 3.13) that further levels of housing in Thatcham are required by stating that the role of Thatcham and its potential for strategic level development which can deliver infrastructure will be considered through the preparation of the new Local Plan. It is entirely correct that additional growth at sustainable locations in Thatcham is considered when reviewing West Berkshire's housing need. The Council's focus should be on reviewing its housing need and ensuring it has a five year supply of deliverable sites. It is unsound to dismiss housing development in Thatcham on the basis that the town needs a small amount of development over the plan period.
- In the context of the Hunston judgement, the Housing Site Allocations DPD will not provide a sound basis for resisting planning applications in the Thatcham and will not in its current form assist with the delivery of infrastructure such as schools and community facilities that the Council has identified as being important.

Council response:

The spatial distribution of development across West Berkshire, including within Thatcham, is set out within the Core Strategy DPD. The Core Strategy was found sound following an Examination by an Independent Inspector. The Core Strategy allocates strategic development sites, and the role of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic housing sites across the district.

The Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy is clear that Thatcham is to receive a lower allocation than other urban areas given the rapid expansion of the town in recent years. This is to allow Thatcham a period of consolidation, ensuring the infrastructure and town centre facilities can be upgraded and meet the demands of the existing population. This will enable Thatcham to become more self-contained, encouraging residents to shop and socialise locally. In accordance with the Core Strategy, Thatcham will not accommodate large scale development.

The role of Thatcham and its potential for strategic level development which can deliver infrastructure will be considered through the preparation of the new Local Plan.

Available brownfield land that the Council has been made aware of by site promoters is included within the Strategic Housing Land Availability Assessment. Where

suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary through the plan-led process. The Housing Site Allocations DPD therefore seeks to allocate land outside of, but adjacent to, existing settlement boundaries of those settlements within the settlement hierarchy.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THA025: Lower Way, Thatcham

Responses received: 264

A petition opposing the development of the site was received – an electronic version contained 521 signatures and a paper version contained 1,850 signatures.

1. General

Consultation comments:

- Impact on existing residents not considered.
- Thatcham Town Council should consider purchasing the site so that it could become part of the nature reserve.
- The field should not be developed as a site for Gypsies, Travellers and Travelling Showpeople.
- The DPD document is not easy to understand.
- Principles of the Council Strategy 2014-2018 not being considered, eg. putting people first, empowering local communities, facilitating the development of Neighbourhood Development Plans, protecting the environment and promoting a vibrant district.
- Unlikely that the Council will give consideration to the public objection to the development of the site.
- The site is important to the identity of Thatcham.
- Development will result in overcrowding.
- Would there be work for 87 new families in Thatcham?
- Development will lower property values.
- Loss of views for the residents of Lower Way. Property values will decline.
- Site could be used as allotments or a solar farm.
- Proposal inconsistent with Planning Policy. If any other party were to make a planning application to build in such a location, this would be rejected.
- The requirements of the Core Strategy would not be significantly and detrimentally impacted by the development of THA025.
- Sustainability not considered.
- Impact on residents in 100 years time not considered.
- Increase in anti-social behaviour.
- Research shows densely populated areas suffer from increased crime rates.
- Police station lost to development.
- Comments made in relation to the notes of the Strategic Housing Land Availability Assessment (SHLAA) Consultation Event – Cold Ash (and Thatcham) of 5 February 2014 which are included within the Statement of Consultation (Appendix D) – accuracy, some comments unsubstantiated, relevance of some issues raised questioned, discrepancies between the Thatcham Vision and observations made at the event, did ordering of bullet points relate to the level of priority given?, was the opportunity to join another town/parish's consultation

event afforded to other town and parish councils?, did the events influence the shortlisted sites within the preferred options document?

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

National Planning Policy Guidance requires planning policies and decisions to not undermine quality of life. Policy CS14 (Design Principles) of the Core Strategy requires that all new development must make a positive contribution to the quality of life in West Berkshire. All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which considers the likely significant effects of the policies and proposals on social, environmental, and economic factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

Comments noted. The site has been submitted to the Council by the site promoter for inclusion within the Strategic Housing Land Availability Assessment (SHLAA). The sites set out in the Preferred Options DPD are based upon sites put forward for the SHLAA.

The site has been shortlisted as a preferred option within the HSA DPD for residential development.

Comment noted. The Planning Policy team can provide further advice on the Housing Site Allocations (HSA) DPD if required.

It is the planning issues identified in the responses received which will be important. The volume of objections received would similarly show the amount of people concerned by the issues raised.

Some of the issues identified are not material considerations in the planning process. A material planning consideration is one which is relevant to making the planning decision in question, eg. whether to grant planning permission or not. In general, material considerations are concerned with land use in the public interest, so the protection of purely private interests such as the impact of development on the value of a property or loss of private rights to light could not be material considerations.

The Housing Site Allocations DPD seeks to allocate sites for residential development in accordance with the development plan. The HSA DPD will not be identifying or designating areas of land for other purposes, such as allotments or solar farms. The landowner promoted the site for residential use.

The site assessment process focused on sites that had been assessed as 'potentially developable' within 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 and local planning policy, and focus on all aspects of sustainability.

Any site that is allocated within the Housing Site Allocations DPD will need to be subject to a planning application which will be assessed against the Development Plan for West Berkshire, in addition to national planning policy.

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. The assessment of this site did not result in any significant impacts on sustainability. The SA/SEA can be viewed at:

<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38059&p=0>.

All development will be designed to create safe environments, addressing crime prevention and community safety as required in national and local policy.

Comments about the police station being lost to development noted.

The statements are observations made by the town and parish councils. The purpose of the early consultation events was to informally discuss the potential housing sites identified in the SHLAA and to gain further information on local issues, community aspirations and local preferences for the sites. The comments made through the consultation events have been used in the process of site assessment to identify local factors relating to each site.

Comments made about the accuracy/relevance of issues and discrepancies between the Thatcham Vision and observations made at the events are noted.

Following the sessions, the notes were circulated to the parish/town councils for any further comments to be added. The observations made at the consultation events do not include a council response because they are meeting notes.

Cold Ash Parish Council was invited to attend the meeting held with Thatcham Town Council because several of the north Thatcham SHLAA sites fall within the parish boundary for Cold Ash.

The order in which the bullet points appear relates only to the order in which topics were discussed.

2. Affordable housing

Consultation comments:

- Support for more affordable housing.

Council response:

Comment noted. Should the site be allocated and a planning application subsequently submitted, then provision of affordable housing would be required in line with Core Strategy policy CS6 (provision of affordable housing).

3. Agricultural use of the site

Consultation comments:

- Agricultural use of the site disputed as minimum/ongoing agricultural use over the last 30 years –field used more recently for car boot sales and the circus. The field has lain fallow apart from broad beans being planted, and, subsequently ploughed in. Grain was planted and harvested in 2014.
- Crops were only planted on the field two years ago. Were they planted in order to deem the site suitable for gaining planning permission?
- The site is in agricultural use and should be preserved to reduce food miles.

Council response

The primary land use of the site was described as agricultural when the site was submitted by the site promoter for consideration within the Council's Strategic Housing Land Availability Assessment in 2013.

The Core Strategy is clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary, therefore the Housing Site Allocations DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy.

4. Consultation process

Consultation comments:

- Consultation process and timing inappropriate – consultation took place over the summer holiday period, only those within 100m of shortlisted sites were consulted, letters were marked 'to the occupier' and could have been mistaken for junk mail. This indicates an underhand process.
- First consultation of DPD took place with Thatcham Town Council on 5 February 2014 and the next consultation is due in January 2015. What is the likelihood the Council will allow a similar 11 month elapsed period for public consultation on the DPD before the final DPD is published?

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

Unfortunately the timing of the consultation was unavoidable due to the timeframe for the preparation of the DPD. The consultation period was extended from the usual six weeks so that it ran for seven weeks to take account of the summer holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. It is anticipated that this consultation will commence in November 2015. Following the consultation the plan will be submitted to the Secretary of State for examination in public.

Public consultation on the preferred options stage of the DPD was extensive and involved notifying all those registered on electronic consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case with consulting on major planning applications, letters were sent to properties located within 100m radius of the proposed sites, and a press release was issued. The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the response to the consultation was extensive with around 4,500 people making around 8,500 comments.

5. Contamination

Consultation comments:

- There was a refuse tip in the field (opposite 35 Lower Way and the entrance to Paynesdown Road). Often gravel extraction was infilled with domestic waste and rubbish in the early 1950s.

Council response:

The Council's Environmental Health department have advised that opposite 53 Lower Way there is suspected contamination, and there is also suspected contamination on land north of the Thatcham Nature Discovery Centre. The Council's records indicate a landfill site adjacent to the proposed development site. Should the site be taken forward as an allocation there will be a requirement for a contamination assessment as part of any planning application.

In many cases development can help to improve the levels of contamination.

6. Cultural heritage and the built environment

Consultation comments:

- Archaeological potential on the site (well preserved remains of a Mesolithic settlement dating from 7700 BC were discovered along Lower Way) and this has not been considered. Archaeological potential is an excluding criterion from Preferred Option status for other Thatcham sites.
- The site is a historic field due to Thatcham being the oldest village in Britain.

Council response:

English Heritage commented that further investigation will be required. This should be a requirement within the DPD should the site be taken forward as an allocation unless it is undertaken prior to the submission of the DPD.

Screening of the sites by the Council's archaeological officer has taken place. As with other sites, the site has been identified as having archaeological potential. A full archaeological desk based assessment would be required at the planning application stage, with mitigation strategies identified if required.

7. Density:

Consultation comments:

- Density excessive. A lower density would be more suited to the area.
- High density developments impact upon the amenity of the residents of such developments.
- The development potential of the site is misleading – Government has indicated that developments of 30 dwellings per hectare should be avoided.
- Developers complete more houses on sites than are permitted.

Council response:

The Preferred Options DPD, which are indicative only at this stage, sets out a density of 30 dwellings per hectare for this site. The suggested density has been based upon policy CS4 of the Core Strategy, along with the character and size of the site, and the distance of the site boundary to a town/district centre. This density is then used to provide an indication of the development capacity of the site.

The final densities for the site, should it be allocated, would be subject to more detailed work at the planning application stage and consideration of Core Strategy policy CS4 (Housing Type and Mix) which sets out density requirements. A Landscape and Visual Impact Assessment (LVIA) would be required as part of any planning application which would inform the density of the site taking into account the surrounding context.

Developers must comply with the conditions of planning approvals.

8. Design and layout

Consultation comments:

- Trend for low cost houses in the area to be 3-storey town houses. Will such property types be included on the site?
- Small closes with an area of open space in the centre similar to the Moors Estate would be beneficial.
- Appears that buildings will be located near to the road – this is unacceptable.

Council response:

Detailed design and site layout is a matter for the planning application stage. Development will need to take into account the character of the existing residential development, including density and design, and comply with Core Strategy policy CS19. As outlined above a LVIA would be required as part of any planning application to inform the final capacity and layout of any development scheme.

9. Ecology

Consultation comments:

- Part of site a Local Wildlife Site.
- Site forms part of Living Landscape Project Area.
- Impact on wildlife and protected species, eg. newts at Thatcham Nature Discovery Centre, slow worms at Thatcham Angling Lakes.
- Impact on Thatcham Reed Beds Site of Special Scientific Interest (SSSI) and the Kennet and Lambourn Floodplain Special Area of Conservation (SAC).
- An Environmental Impact Assessment (EIA) should be undertaken.
- Has the Nature Discovery Centre been consulted?
- Additional noise, pollution and street lighting will affect the nature reserve.
- The site acts as a buffer zone between current housing and the Thatcham Nature Discovery Centre.

Site promoter comments:

- Confirmation that that site is not encumbered by mature or protected trees, not subject to any ecological constraints

Council response:

The site does not form part a Local Wildlife Site. The Sustainability Appraisal (at Preferred Options) incorrectly identified the site as a Local Wildlife Site and this has now been amended.

The site does not form part of the Living Landscape Project area but it does lie adjacent to it. As such, any development scheme will be required to support and make a positive contribution to the West Berkshire Living Landscape project.

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options. The Council's ecologist has advised that any planning application must be accompanied by a full suite of ecological surveys. Appropriate avoidance and mitigation measures would need to be implemented to ensure any protected species are not adversely affected. Any application will also need to show that the development of this site will not impact on the water quantity and quality in Thatcham Reedbeds SSSI/Kennet and Lambourn SAC.

Regarding the impact upon the Kennet and Lambourn Floodplain SAC, Natural England has advised that a Habitats Regulations Assessment (HRA) screening will need to be undertaken at the planning application stage. This requirement will be reflected in the policy should the site be taken forward as an allocation.

The Council's ecologist has advised that an EIA is not required.

The site does not form part of the Thatcham Nature Discovery Centre which is run by BBOWT. BBOWT were however consulted at the preferred options stage. The Council's ecologist has commented that residents of the site would use the Thatcham Nature Discovery Centre leading to additional pressure on a site that is already suffering very high use. Mitigation will therefore be required to offset this impact.

Comments that the site acts as a buffer zone between existing residential development and the nature reserve noted. Should the site be taken forward as an allocation the site specific policy for the site will include a requirement for the strengthening of the existing tree belt along the southern boundary of the site to form a robust open space/landscape buffer with the Thatcham Nature Discovery Centre and the Thatcham Reedbeds SSSI which will include ecological mitigation. The extent and nature of this buffer will be informed by a LVIA at the planning application stage.

10. Flood risk

Consultation comments:

- History of flooding on the site, on Lower Way and at the Nature Discovery Centre.
- Flood risk in Thatcham.
- The site is adjacent to a Critical Drainage Area (the north side of the road from Paynesdown Road travelling westwards), which is not referred to.
- Environment Agency flood maps recognise that the area has surface water flood risk. No reference is made to this in the assessment of the site.
- Flooding caused by heavy rain causes sewage to come up into the field.
- Development will exacerbate flooding.
- What control measures will be implemented to ensure there is no flooding?
- Investment should be made to the existing drainage systems and flood prevention to support prior to development.
- A Flood Risk Assessment should be carried out.

- No development should take place until the Surface Water Management Plan for Thatcham is fully implemented.
- New householders may be unable to get home insurance.

Site promoter comments:

- Confirmation that that site is not liable to flood

Council response:

Flood risk in Thatcham is noted. The site falls within Flood Zone 1 whereby the risk of flooding to the site is low. Flood Zones are identified by the Environment Agency and refer to the probability of river flooding ignoring the presence of defences.

The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) does refer to the site being adjacent to a critical drainage area; however this will be made clearer along with other references to flood risk. A small area on the southern boundary of the site is susceptible to surface water flooding, and this was not picked up clearly in the SA/SEA. The SA/SEA has now been updated to ensure this is clearly reflected.

The Council's Principal Engineer has advised that there is no evidence of flooding on the site. The site is adjacent to an area of surface water flood risk. A Flood Risk Assessment would be required with the submission of any planning application, taking into account all potential sources of flood risk. Sustainable drainage systems (SUDs) and/or alternative mitigation measures will be required as part of any development that takes place in line with Core Strategy policy CS16 (Flooding).

11. Gaps between settlements

Consultation comments:

- Not long until Newbury and Thatcham are joined up.
- The site is the last open field separating Thatcham and Newbury on the southern side of the A4. Development would make Thatcham one large housing sprawl.
- The site is the only greenbelt land between Thatcham and Newbury. Greenbelt is precious in Thatcham.
- Absence of brownfield sites as preferred options. Brownfield sites should be used before greenbelt ones.

Council response:

A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward

in policy CS19 (Historic Environment and Landscape Character) of the Core Strategy.

Policy ADPP3 (Thatcham) of the Core Strategy also seeks to maintain and enhance the individual identity of the settlement of Thatcham, and ensure that it is separate to that of Newbury and the surrounding rural settlements.

The site is not located within statutory greenbelt. No such designation exists within West Berkshire.

12. Highways and transport

Highway network/traffic:

Consultation comments:

- Existing congestion and traffic disruption would be exacerbated by development.
- Impact of increased traffic movements on Lower Way, A4 Bath Road, Paynesdown Road, Green Lane, Herons Way, Thatcham as a whole, Kiln Lane (Shaw) and Love Lane (Shaw).
- Traffic impact assessments should not be undertaken during school holidays, and should take account of roadworks, and the closure of the A4 Bath Road/Crookham Hill/Burys Bank Road.
- Previous planning applications for residential development on Lower Way refused due to access/egress to the site and road safety.
- A bridge over the railway crossing at Thatcham would make a massive improvement to Thatcham's increasing traffic problems during the peak rush hour.
- Would traffic be diverted along Paynesdown Road and Green Lane when Lower Way floods?
- Road safety concerns – additional traffic movements a risk to pedestrians/cyclists, issue of speeding along local roads, insufficient traffic management at present.

Site promoter comments:

- The site abuts the public highway and benefits from an existing access onto Lower Way. Therefore confident that a new and safe vehicular access can be achieved.
- Confirmation that that site is well located to sustainable modes of transport.

Council response:

Comments noted.

All shortlisted sites were subject to an initial screening by the Council's Highways and Transport team. This provided a simple high level indication of the likely traffic generation from each shortlisted site and highlighted potential highway issues that could impact on deliverability of the site. For this site it has been advised that the impact of additional traffic may be limited as traffic may disperse fairly equally east

and west to and from the site, but this would need to be assessed by a Transport Assessment.

The Council has commissioned Transport Assessment (TA) work to assess the impact that development of the shortlisted preferred option sites would have upon the highway network. The TAs indicate that the sites themselves are unlikely to have a significant impact on the highway network, meaning that there will be limited impact on local congestion. More detailed site specific work would be required at the planning application stage taking into account the detailed proposals.

Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany any future planning application. This would consider in detail the local impact of the development, including access, safety and the consideration of any necessary mitigation measures. A travel plan, promoting the use of alternatives modes of travel to the car, would also be required.

Parking:

Consultation comments:

- Will there be a parking space with each house?
- Car parking would be under planned and would result in overspill in the Nature Discovery Centre.
- Suggested proposals for pay and display parking at the Thatcham Nature Discovery Centre parking area unfair.
- Difficult to park near the shops at peak times.

Council response:

Previous parking policies to restrict the amount of parking provided in new developments have caused a number of issues in terms of overspill on-street parking and conversion of front gardens to parking spaces. As a result, new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking. An updated policy regarding parking standards will set out within the DPD, and any new development must comply with the policy.

Public transport:

Consultation comments:

- Limited public transport options.
- No sustainable transport strategy for the area.

Council response:

The Council's Passenger Transport Officer has advised that the site is acceptable in public transport terms.

There are regular public transport services throughout Thatcham, with the nearest bus stop c.360m from the centre of the site. There is also a bus stop c.796m away on the London Road. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application. The site is approximately 2.6km from Thatcham Railway Station, this is just over the Chartered Institute of Highways and Transportation (CIHT's) acceptable walking distance for Commuting or Travel to school of 2km (CIHT, 2000), however, it is within cycling distance.

A travel plan, promoting the use of alternatives modes of travel to the car, would be required alongside any planning application.

Walking and cycling:

Consultation comments:

- Development will interfere with the cycle path (National Cycle Route 4) on the southern side of Lower Way.
- Extensive network of regularly used pathways across the site which have been used over the last 50 years. Aerial photographs of THA025 held by the Definitive Map Officer clearly show multiple pathways through the field.
- The Council has failed to follow the guidance set out in Rights of Way Circular (1/09): Guidance to Local Authorities (DEFRA), specifically sections 5.3, 7.4, 7.5 and 7.6.
- Grounds exist to support Public Rights of Way status for the paths. Submission of application for such status is in progress.
- The Council purchased in 2001 part of a field on the south side of Lower Way. The Charges Register on the Title Deed identifies that *"the land is subject to the rights reserved by a Transfer of the land in this title dated 13 July 2001 made between (1) Francis Frederick Wallis and others and (2) West Berkshire District Council."* Does the rights reserved relate to pedestrian access to the field? The Council has constructed a wooden fence along the perimeter of the cycle path which clearly facilitates pedestrian access into the field at the Paynesdown Road entrance and at the entrance at the northern end of the footpath from Jubilee Lakes at the junction with Lower Way.
- Development would create additional numbers of pedestrians accessing Thatcham town centre. Footpaths close to the centre on Church Gate are narrow and obstructed by parked vehicles.

Council response:

The Council's Transport Policy team has advised that development will not impact upon the cycle path. Road markings on an access road to the site could be put in place behind the cycle path.

The site is in private ownership and there are no recorded public rights of way across the site.

Official claims for the recognition of 13 public rights of way, crossing the entire area of site have been received by the Council's Rights of Way team. These claims are presently being processed and it is as yet unknown if they are likely to be successful. The Council has a duty to investigate evidence from local walkers, from the landowner and from historic documents to see if any public rights of way can be said to exist on the land. Claimed public rights of way cases are based on evidence only, and not on suitability/desirability/planning issues. The evidence is weighed up against legislation and case law before a formal decision is made.

Section 5.3 of Rights of Way Circular 1/09 has regard to consultations before Orders, and this relates especially to the Highways Act 1980 and TCPA 1990 Orders – claimed public rights of way would be made under Wildlife and Countryside Act 1981 if, after investigation, the Council considers that it is reasonable to allege that public rights of way exist. The Council always consults ward members, landowner, occupiers, town/parish councils, and local user group representatives before making an Order. When an Order is made, it is advertised on site and in a local newspaper. In this claimed public rights of way case, no formal decision has yet been made.

In respect of paragraphs 7.4 to 7.6 of Rights of Way Circular 1/09, at this stage there are no proven rights of way over the land. The Council are following the legal process - whereby anyone can apply for an Order to record public footpaths on the Definitive Map and Statement - this is done under section 53 and Schedule 14 Wildlife and Countryside Act 1981. No decision has yet been made

The Land Registry document refers to rights reserved between the Council and the Wallis family; it does not refer to public rights of way.

Comments about footpaths on Church Gate noted.

13. Infrastructure

Consultation comments:

- Infrastructure at capacity.
- No apparent intention to invest in infrastructure to support development.
- Development should not take place until the infrastructure is put in place.
- Better recreational facilities for the youth required.
- Schools at capacity, eg. Parsons Down, Spurcroft Primary. Development would place further pressure on them. Capacity of schools should be increased or new schools should be built.
- Class sizes will increase and this will have an impact upon the quality of education received.
- All children in the development will be required to attend Spurcroft Primary School or a secondary school in Newbury.
- The catchment area for the Kennet School has reduced and those living west of Green Lane must attend Trinity School in Newbury, a 58 minute walk away. Parents of these children are offered a bus service at a cost of at least £500 per

annum (£400 per annum also cited). If this cost can be borne, buses are limited and there are limited seats.

- Could extra space on THA025 be developed for a school?
- Lack of shops and variety of supermarkets. Residents reliant on larger centres.
- Impact on GP services, dentists, local hospitals, district nurses, and day centres.
- Both Thatcham and Burdwood Health Centres are oversubscribed, with Thatcham health centre unable to accept more patients.
- No useful hospital or maternity unit

Council response:

The Infrastructure Delivery Plan for the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL at the planning application stage.

With regard to education, early consultation with the Local Education Authority indicated that the impact of additional development is not expected to have an impact on secondary provision (the site is within the catchment for Trinity School in Newbury), however there could be issues with primary provision which will need to be addressed through the planning application. Reconsultation has not raised any issues.

Utilities

Consultation comments:

- Where will the extra water come from? Water companies are criticised for abstracting water from the ground and the effect that this has on habitats.
- Sewage works at capacity. Development would place additional pressure on the facility and further the risk of overflow.
- Understood that lorries transport untreated water to the treatment works because pipe lines are inadequate.
- Main sewage pipe runs through the site and it is understood the site would not be developed because of this.

Council response:

Thames Water has not identified any issues with water supply, however they have commented that the current wastewater network is unlikely to support the demand generated by the development. Following further discussions, Thames Water advised that under the Water Industry Act developers have an automatic right to connect to the sewer; this can be addressed at the planning policy stage by asking for a drainage strategy and then later by asking for conditions at the planning application stage. Therefore, should the site be taken forward as an allocation an integrated strategy for water and wastewater will be required to support a planning application and that this should cover flood risk, water quality and conservation. The strategy would need to be clear how a solution would be delivered to any concerns identified as the development came forward.

Thames Water has confirmed that there are a number of sewers on the site and the main issue would be the two foul sewers which cross the site from east to west. It has been advised that the sewers could be diverted if the need arose or easements will need to be held around them. It will be for the developer to liaise with Thames Water regarding the most appropriate approach.

14. Landscape/setting

Consultation comments:

- Site within AONB.
- Sensitive landscape.
- The site is on a hillside and development would affect the scenic views into and out of the nature reserve.
- Lower Way forms a clear and distinct boundary to the settlement of Thatcham. Particular importance must be placed on those remaining sections which allow direct connection with and open views over countryside to the south. The elevated position of the site is of major significance in this regard.
- The site is one of the few areas in Thatcham that is rural in character. Development would urbanise the area.
- Losing the openness of the field would spoil the street scene and the surrounding area.
- Site one of the few pieces of green land between Newbury and Thatcham.

Council response:

Natural England has advised that landscape impacts should be considered, however they acknowledge that the AONB is 2.5km to the north and east through Thatcham.

All development will be of a high quality and sustainable design that respects and enhances the character, appearance and landscape of the wider area. This is a requirement of the Council's Core Strategy (policies CS14 Design Principles and CS19 Historic Environment and Landscape Character).

A Landscape Visual Impact Assessment (LVIA) will need to be submitted alongside any planning application. This would consider the site in the wider context, particularly in relation to the lakes to the south of the site and the existing housing to the north. It would also show how the proposed development would comply with policies CS14 and CS19 of the Core Strategy. The LVIA would then inform the proposed development scheme, including the location of the public open space on the site and the nature and extent of the landscape buffer to the south of the site.

15. Open/recreation space

Consultation comments:

- Development would result in the loss of open space. Shortage of open space in Thatcham.
- The parks and playing fields around Lower Way are at risk from increased numbers, and also becoming lost to development in the future.
- Open space should be provided at the centre of the development.
- Site used for leisure and recreation – dog walking, Council has granted the license for car boot sales, fairs and a circus to be held on the site. Development will fail to encourage healthy, active lifestyles.
- Community amenity value of the site has not been considered. The site has been classed as amenity land for over 25 years.
- A Thatcham children's football team uses a pitch at Douai Abbey in Woolhampton for home matches. There is therefore a need to keep the site so that children can enjoy outdoor activities.
- Development would restrict access to the community orchard.
- Thatcham Town Council should take ownership of the field to provide recreational space for local residents.

Council response:

The site is in private ownership and there is existing open space to the east of the site.

Should the site be allocated and a planning application subsequently submitted, development on the site would need to meet the requirements of the Green Infrastructure policy (CS18) of the Core Strategy and saved policy RL.1. Details of open space provision, ie. location, would be subject to more detailed work at the planning application stage.

The site submission details to the Strategic Housing Land Availability Assessment indicated that public open space/buffer to countryside to the south of the site would be provided if the site is allocated.

16. Pollution

Consultation comments:

- More houses will result in pollution.

- Against the growing evidence of climate change and global warming, greenfield sites should not be developed.
- Litter will increase.
- An increase in traffic/particulate emissions will result in an increase in pollution in an area where there is already a high incidence of asthma and other chronic respiratory problems.
- Limited consideration of environmental impact, eg. greenhouse gas emissions and carbon footprint.
- Limited consideration of noise pollution.
- More houses will generate additional noise.
- Traffic noise levels are already high.
- A new road junction would increase traffic noise due to vehicles starting and stopping.
- There will be noise during the construction period.

Council response:

It is unlikely that development of the site will have a significant impact on noise or air quality pollution.

All development proposals will be expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 (Sustainable Construction and Energy Efficiency) of the Core Strategy DPD.

Should the site be allocated and a planning application subsequently submitted, then proposals will need to comply with West Berkshire District Local Plan 1991-2006 Saved Local Plan policies (2007) OVS.5 (Environmental Nuisance and Pollution Control) and OVS.6 (Noise Pollution).

A certain amount of noise is to be expected in most types of construction and cannot be completely prevented. The Council can serve a notice imposing requirements as to how construction works should be carried out to minimise noise and disturbance. The notice can cover working hours and noise limits.

17. Principle of development

Consultation comments:

- Why is THA025 the only preferred option for Thatcham?
- Thatcham in danger of over-development. Why is it always forced to accommodate new housing?
- There are fewer areas in Newbury being considered for housing despite the road infrastructure being better.
- This is not a long term strategy – what is the long term plan if all the other sites are unviable? The Council would be better off looking at larger viable sites, or removing some of the constraints that make the larger sites unviable. Little thought has been given to the reason for extra housing.
- Greenfield sites that are in use as recreational spaces or well used by the community should not be used.

- Developing greenfield sites is contrary to the rural sustainability objectives of the Core Strategy.

Site promoter's comments:

- Site now under the control of Persimmon Homes (Thames Valley).
- Deliverable within a 5 year period.
- Support for the Council's analysis of the site being available, achievable and deliverable.
- Site is a logical future growth point for the town. It is in a sustainable location – it is in close proximity to the town centre, there are good transport links, and there are a range of other facilities within short walking and cycling distance.
- Support for the provisional estimate that the site can accommodate 87 dwellings; however final capacity may be higher when informed by further technical work and assessment. The National Planning Policy Framework (NPPF) requires developers to make efficient use of land.
- The inclusion of Land at Lower Way, Thatcham (THA025) is consistent with the objectives of the NPPF. It is sustainable development which would make an important contribution towards the housing need of the area (paragraphs 14 and 15). Furthermore, the release of this site will help the Council achieve their requirement to 'boost the supply of housing' across West Berkshire (paragraph 47).
- The Housing Site Allocations DPD Preferred Options has been prepared using a sound evidence base, which is in line with the guidance of the NPPF. The sites that have been identified within the Housing Site Allocations DPD Preferred Options will make a positive contribution to a deliverable 5 year land supply; albeit we note that the housing requirement may change as the Strategic Housing Market Assessment (SHMA) progresses.
- Further technical work is currently being progressed by Persimmon Homes and this information will be made available to the Council's Planning Policy team over the coming months.

Alternative locations:

Consultation comments:

- Government policy requires priority to be given to developing brownfield sites.
- For the remainder of the Core Strategy period, there is likely to be a sufficient number of sites in the planning process (ie. with permission) and brownfield sites to meet the housing requirement.
- Brownfield sites identified – land between Thatcham and Midgham, Pound Lane depot (THA029), 1-8 Clerewater Place (THA034), disused waste tip area in Pound Lane, land opposite the pet shop on Moors Road, parts of the old ordinance army depot, Henwick Lane (2 sites), Taceham House and Sydney Close.
- Unused industrial land.
- Empty office and warehouse buildings in Thatcham and on the Hambridge Road and Bone Lane industrial estates in Newbury.

- Redevelopment of empty properties, eg. on the A4 between Thatcham and Newbury.
- Sites already in the planning process should be considered, eg. Crown Court, THA009, THA023, THA029 and THA034.
- Land to the north of the A4 which is within the settlement boundary.
- If greenfield sites have to be used to accommodate development, then sites should be chosen where there is a bridge to cross the railway, canal and river.
- Siege Cross Farm.
- Land north of Floral Way and east of Harts Hill Road (THA028).
- Turnpike Lane.
- North Thatcham.
- Thatcham Garden Centre (THA023).
- Greenham Common, land near the Vodafone HQ at Shaw, or land near Chieveley service station.
- Land near Dunstan Park has been earmarked for possible extra housing development for some years – why has this not been chosen?
- The requirement for the other 100 houses could be sited on the perimeter of the already planned sites.
- A new village should be created, with infrastructure, to the west of Newbury. It would have easy access to the M4, A4 and A34 without having to add to the traffic congestion of either Thatcham or Newbury. Future development could then be focused on this new village instead of Newbury or Thatcham.
- No alternatives to expand Thatcham - most small spaces already developed, extensive development south of the railway crossing will result in more congestion, expansion north of Harts Hill Road has resulted in the loss of open space.

Council response:

The Core Strategy allocates strategic development sites, and the role of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic housing sites across the district.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

All comments made during the consultations on the plan will be before the Inspector. The Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and that the Duty to Cooperate, legal and procedural requirements have been met.

The site (THA025) was submitted to the Council for inclusion within the Strategic Housing Land Availability Assessment (SHLAA), and therefore, it is acceptable to consider the site for development.

The Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy is clear that Thatcham is to receive a lower allocation than other urban areas given the rapid expansion of the town in recent years. This is to allow Thatcham a period of consolidation, ensuring the infrastructure and town centre facilities can be upgraded and meet the demands of the existing population. This will enable Thatcham to become more self-contained, encouraging residents to shop and socialise locally. In accordance with the Core Strategy, Thatcham will not accommodate large scale development.

The role of Thatcham and its potential for strategic level development which can deliver infrastructure will be considered in the through the preparation of the new Local Plan. Work on the new Local Plan will commence following adoption of the Housing Site Allocations DPD in November 2016.

Available brownfield land that the Council has been made aware of by site promoters is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary through the plan-led process. The Housing Site Allocations DPD therefore seeks to allocate land outside of, but adjacent to, existing settlement boundaries of those settlements within the settlement hierarchy.

Housing requirement

Consultation comments:

- No need for this amount of additional housing in Thatcham or West Berkshire, especially as little provision for this to be made up of affordable housing.
- The housing quota is unrealistic and unviable.
- The Preferred Options DPD is based on data from March 2013. The eventual housing requirement for Thatcham may vary from the current expectation.
- How it is that other Thatcham sites have been excluded from Preferred Option status using the criterion "potential on site greater than required"? For this to be an exclusion criterion, the DPD should declare both the currently assumed housing requirement for the Thatcham area and the tolerance level of housing development volume up to which a site will be considered.
- There is a likely to be a broad range of development potential on a given site which is determined by the area of the site that would eventually be required or

offered for development, and the density of housing agreed in the planning process, both of which are future considerations beyond the scope of this DPD.

- Vast overdevelopment of the site – over 800 properties have already been built or have planning permission for the 900 required in Thatcham. Developing the site for 87 homes when figures suggest that only 50 or less may be required.

Council response:

The Core Strategy sets the minimum number of dwellings the Council need to provide between 2006 and 2026 and the spatial strategy for where sites will be allocated. Going forward, Councils are required to assess their own housing requirement (Objectively assessed need - OAN) through a Strategic Housing Market Assessment (SHMA). The Council's SHMA has been carried out in conjunction with the other Berkshire Authorities and will be published in the autumn of 2015. The Housing Site Allocations DPD will fulfil the remaining Core Strategy requirement and provide additional flexibility to meet the first few years of the OAN.

The adopted Core Strategy sets out the spatial strategy for the Newbury and Thatcham part of the District. The principle of providing more residential development in Thatcham is therefore established. Area Delivery Plan Policy 3 of the Core Strategy sets out that sites will be allocated to fulfil this requirement on greenfield land adjacent to the settlement.

See Sections 1 and 2 of the DPD for the Council's responses to the matters relating to the housing requirement.

Site selection process:

Consultation comments:

- The site assessment is poorly compiled and does not give a proper or balanced comparison against other sites.
- The site selection process is flawed, unreasonable and not credible for the site to be the only feasible option. Reasons for not taking other sites forward apply to THA025, eg. surface water flood risk, access improvements required, significant development already allocated, part of local wildflower site, close to Local Wildlife Site, rural character, potential for flooding, high sensitivity landscape, bounded by green infrastructure, and archaeological potential.
- The site did not appear to receive the same level of representation as the others and appears to have been used to avoid developing other sites, eg. it is acknowledged that Thatcham only requires a limited number of new dwellings. THE028 was rejected on the basis that 103 dwellings exceeds this limit, whereas THA025 offering only 16 dwellings less is considered suitable.
- Viable alternatives have not been considered. The alternatives presented are ruled out by issues such as flooding, leaving THA025 as the only alternative – essentially a fait accompli. This site has been pre-determined and the assessment designed to back it up. THA025 was only turned into arable land in recent years, and then left to fall into disuse, thus making it an easier target.

- There is incorrect information within the site assessments which leads to misunderstandings, eg. the field has high category surface water flood risk zones on the Environment Agency flood maps which is not mentioned.
- Not enough research undertaken across West Berkshire to accommodate this allocation.
- The summary of the assessment fails to justify the release of greenfield land.

Site promoter's comments:

- Support for findings of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) which concludes that the site has a neutral effect on sustainability.

Council response:

No pre-determination has been made, and the assessments have not been produced retrospectively.

The site selection process has been rigorous and the site assessment criteria, which have their basis in national and local policy, were developed to assess the suitability of sites for allocation in the DPD, and focus on all aspects of sustainability, ie. economic, environmental, and social.

All sites promoted through the Strategic Housing Land Availability Assessment (SHLAA) and identified as 'currently developable' have been assessed in a fair and consistent basis through the site selection framework, taking into account information available at the time of assessment. Following the Preferred Options consultation the site assessment work will be considered again and any new information arising from the consultation will be taken into account, and amendments made where appropriate.

Details of the site selection process and the Council's justification for taking sites forward/rejecting sites are contained within the SA/SEA Report.

The volume of responses received will not influence the location of development as it is the planning issues identified in the responses received which will be important. The volume of objections received illustrates the amount of people concerned by the issues raised.

All sites were initially assessed against automatic exclusion factors, and this determined which sites should be ruled out or considered further. All sites not automatically excluded were then assessed against a range of further considerations which looked in more detail at the suitability of sites for development, for example land use, contamination, accessibility and capacity of local services.

Early consultations were held with technical experts to inform the site selection process, eg. Highways and Transport, Ecology, Environmental Health, Archaeology, Environment Agency and Thames Water, and in some cases their comments have shown that a site cannot be delivered.

The 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. The parish and town councils had the opportunity to comment on the shortlisted sites at Preferred Options.

18. Settlement boundaries

Consultation comments:

- The need for an extension of the settlement boundary has not been accepted.
- The settlement boundary should remain intact until the complete implementation of the Surface Water Management Plan and the adoption of a new Local Plan that incorporates the infrastructure required for future growth.
- Why is the settlement boundary being re-drawn around THA025 when other parcels of land have been rejected for being outside of the settlement boundary, eg. those north of Floral Way are described as being “separated from the built form by Floral Way”. THA025 is outside the settlement boundary in the same way and separated from the built form of the northern side of Lower Way. Why would this situation be any different for the purpose of the site assessment?
- Settlement boundaries were implemented to protect the character of the settlement and to prevent unrestricted growth into the countryside. These should not be changed or removed without any public consultation.
- Thatcham should not be allowed to expand further.
- Development would result in a greater loss of the green fields in years to come.
- Developing the site could result in other areas off Lower Way being developed.
- Development would start a precedent for the infilling of land between Thatcham and Newbury.
- Housing numbers on the site will increase in the future.

Council response:

The Housing Site Allocations DPD seeks to allocate sites outside of, but adjacent to, the existing settlement boundaries of those settlements within the Settlement Hierarchy in accordance with policy ADPP1 (Spatial Strategy) of the Core Strategy. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy’s settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the ‘settlement’ area, and protects those areas outside the new boundary from development.

Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation (July – September 2014).

The SA/SEA Report outlines the justification for not taking sites forward as allocations within the DPD, such as those to the north of Thatcham.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THA009: Land at Tull Way, Henwick Lane, Thatcham

Responses received: 2

1. General

Consultation comments:

- No information available on THA009 – how is this site being considered?
- Recent appeal dismissed partly on landscape grounds and partly on the Council's ability to demonstrate a 5 year housing land supply.
- Object to proposed allocation NEW042.

Council response:

The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) does set out an initial assessment on THA009. This can be found in the main SA/SEA Report, Appendix 9A of the Preferred Options consultation documents. The site is within the settlement boundary of Thatcham and therefore no further assessment was undertaken. The Housing Site Allocations (HSA) DPD seeks to allocate sites outside of the existing settlement boundaries of settlements within the Settlement Hierarchy, in accordance with policy ADPP1 of the Core Strategy.

A previous planning application on the site (ref: 12/00279/OUTMAJ) was refused by the Council in 2012 and subsequently dismissed at appeal (PINS Ref. 2191207) in May 2013. The site is now being promoted through the plan-led system.

See Council response to NEW042 regarding the proposed allocation of NEW042.

2. Housing numbers and distribution

Consultation comments:

- HSA DPD relies upon the housing figure within the Core Strategy, not an Objectively Assessed Need (OAN). An OAN should be established through a Strategic Housing Market Assessment (SHMA) before progressing the Housing Site Allocation (HSA) DPD.
- Allocations within the HSA should not be constrained by Core Strategy policy ADPP3. This site is functionally better related to Newbury than some of the proposed allocations around Newbury.
- Thatcham, as a main urban area, should be the focus for development.

Council response:

See Council Response to Sections 1 and 2 of the HSA DPD relating to housing numbers and distribution.

3. Merits of THA009

Consultation comments:

- The HSA DPD does not propose at this stage to amend the settlement boundary, nor does it propose the site be identified as 'important open space'.
- Previous appeal dismissed primarily due to adverse impact upon character and appearance of Thatcham, in particular upon important local views. A revised Concept Plan submitted, outlining a landscape led approach to development in response to the appeal decision.
- Previous landscape work and the Inspectors report sets out that the site is not of overarching importance to the landscape and visual setting of Thatcham, but it does provide open visual amenity.
- The site is accessible to key services and facilities, with short walking distance of regular bus services and within walking distance of Thatcham, Newbury Racecourse and Newbury train stations. Local employment is also close by.
- The site is not protected for heritage or ecological reasons, it is within flood zone 1 and has an agreed access solution agreed at appeal in 2013.

Council response:

The preferred options HSA DPD consulted upon criteria for the review of the settlement boundaries. The DPD did not propose changes to any of the settlement boundaries at the preferred options stage, this element of the work will be set out within the pre-submission version of the DPD.

The HSA DPD seeks to allocate sites for residential development in accordance with the development plan. The HSA DPD will not be identifying or designating areas of land for other purposes, such as important open space. In any case, this local designation was deleted from the Local Plan when the Core Strategy was adopted in July 2012. West Berkshire District Local Plan 1991-2006 saved policy ENV.31 was superseded by policy CS18 of the Core Strategy.

HSA DPD seeks to allocate sites outside of, but adjacent to, the existing settlement boundaries of those settlements within the Settlement Hierarchy in accordance with policy ADPP1 of the Core Strategy. The existing settlement boundaries will be redrawn to include any site allocations. The site (THA009) is within the settlement boundary of Thatcham and therefore will not be allocated within this DPD.

4. Land at Lower Way (THA025)

Part of the representation relates to THA025. This part of the representation has been set out and responded to under the appropriate section of the DPD.

Council response:

See Council Response to THA025 Land at Lower Way.

5. Settlement boundary review

Consultation comments:

- The Core Strategy supports the development of sites within settlement boundaries first.
- Strongly object to removing the site from the settlement boundary.

Council response:

Housing Site Allocations (HSA) DPD seeks to allocate sites outside of, but adjacent to, the existing settlement boundaries of settlements within the Settlement Hierarchy in accordance with policy ADPP1 of the Core Strategy. The existing settlement boundaries will be redrawn to include any site allocations. The site (THA009) is within the settlement boundary of Thatcham and therefore will not be allocated within this DPD.

The Council will carry out a review of the settlement boundaries based on the Settlement Boundary Review Criteria. This criterion was subject to Preferred Options consultation (July – September 2014).

Summary

The Council recognise that a new concept plan has been submitted by the site promoter based on a revised landscape strategy, however this site will not be reassessed through the Sustainability Appraisal (SA)/Strategic Environmental Assessment as the site is within the settlement boundary of Thatcham. As set out above the Council will not allocate sites within the settlement boundary as they already have a presumption in favour of development in accordance with the development plan.

THA027: The Creek, Heath Lane (north of Bowling Green Road)

Responses received: 1

1. General

Consultation comments:

- Disappointed that the submission to the Council by the Parish Council in March 2014 was not included in the DPD documents. Documents submitted, along with the request to amend the DPD documents to recognise the Parish Councils submission.
- Disappointed that the Parish Council not have a chance to comment on site COL11 – Land at Cold Ash Hill. It is considered that the case against the site is so compelling that if given the chance to comment the site would have been excluded from the consultation.
- Submitted revised site assessment forms, along with SA/SEA assessments and commentary documents for the four sites with Cold Ash Parish: COL002; COL006; COL011; NEW045.
- The rejected sites have also been reassessed and documentation has been submitted for NEW105; THA011; THA014; THA019 and THA027. It is requested that the SA/SEA is updated to reflect the proposed amendments in case the site should be considered in the future.
- The SA/SEA fail to take account of, and list, traffic volume statistics, use loose language describing the proximity of facilities, use general term 'mitigation measures' all of which are misleading.

Council response:

The consultation information submitted by the Parish Council in March 2014 was considered in assessing all sites within Cold Ash parish. Whilst this information, as submitted, does not form part of the DPD itself it does form part of the Council's Statement of Consultation published in July 2014 alongside the Housing Site Allocations DPD Preferred Options consultation. The Council acknowledge that in publishing this information Annex A was omitted but this will be rectified as part of the pre-submission version of the Statement of Consultation.

Site COL011 was submitted to the Council after consultation took place with the Parish Councils in February 2014. The site was assessed and consulted upon as part of the Preferred Options consultation. Technical work undertaken more recently has shown that the site is not suitable in landscape terms and therefore the site (COL011) will not be taken forward within the DPD.

The revised site assessment forms submitted by the Parish Council for the various sites within the parish of Cold Ash have been taken into account in revising the site assessments and SA, where appropriate at this stage.

THA014: Land at Regency Park Hotel, Thatcham

Responses received: 1

1. General

Consultation comments:

- Disappointed that the submission to the Council by the Parish Council in March 2014 was not included in the DPD documents. Documents submitted, along with the request to amend the DPD documents to recognise the Parish Councils submission.
- Disappointed that the Parish Council not have a chance to comment on site COL11 – Land at Cold Ash Hill. It is considered that the case against the site is so compelling that if given the chance to comment the site would have been excluded from the consultation.
- Submitted revised site assessment forms, along with Sustainability Appraisal (SA)/Strategic Environment Assessment (SEA) assessments and commentary documents for the four sites with Cold Ash Parish: COL002; COL006; COL011; NEW045.
- The rejected sites have also been reassessed and documentation has been submitted for NEW105; THA011; THA014; THA019 and THA027. It is requested that the SA/SEA is updated to reflect the proposed amendments in case the site should be considered in the future.
- The SA/SEA fail to take account of, and list, traffic volume statistics, use loose language describing the proximity of facilities, use general term 'mitigation measures' all of which are misleading.

Council response:

The consultation information submitted by the Parish Council in March 2014 was considered in assessing all sites within Cold Ash parish. Whilst this information, as submitted, does not form part of the DPD itself it does form part of the Council's Statement of Consultation published in July 2014 alongside the Housing Site Allocations DPD Preferred Options consultation. The Council acknowledge that in publishing this information Annex A was omitted but this will be rectified as part of the pre-submission version of the Statement of Consultation.

Site COL011 was submitted to the Council after consultation took place with the Parish Councils in February 2014. The site was assessed and consulted upon as part of the Preferred Options consultation. Technical work undertaken more recently has shown that the site is not suitable in landscape terms and therefore the site (COL011) will not be taken forward within the DPD.

The revised site assessment forms submitted by the Parish Council for the various sites within the parish of Cold Ash have been taken into account in revising the site assessments and SA/SEA, where appropriate at this stage.

THA011: Land to the north of Bowling Green Road, Thatcham

Responses received: 2

1. General

Consultation comments:

- Disappointed that the submission to the Council by the Parish Council in March 2014 was not included in the DPD documents. Documents submitted, along with the request to amend the DPD documents to recognise the Parish Councils submission.
- Disappointed that the Parish Council not have a chance to comment on site COL11 – Land at Cold Ash Hill. It is considered that the case against the site is so compelling that if given the chance to comment the site would have been excluded from the consultation.
- Submitted revised site assessment forms, along with Sustainability Appraisal (SA)/Strategic Environment Assessment (SEA) and commentary documents for the four sites with Cold Ash Parish: COL002; COL006; COL011; NEW045.
- The rejected sites have also been reassessed and documentation has been submitted for NEW105; THA011; THA014; THA019 and THA027. It is requested that the SA/SEA is updated to reflect the proposed amendments in case the site should be considered in the future.
- The SA/SEA fail to take account of, and list, traffic volume statistics, use loose language describing the proximity of facilities, use general term 'mitigation measures' all of which are misleading.

Council response

The consultation information submitted by the Parish Council in March 2014 was considered in assessing all sites within Cold Ash parish. Whilst this information, as submitted, does not form part of the DPD itself it does form part of the Council's Statement of Consultation published in July 2014 alongside the Housing Site Allocations DPD Preferred Options consultation. The Council acknowledge that in publishing this information Annex A was omitted but this will be rectified as part of the pre-submission version of the Statement of Consultation.

Site COL011 was submitted to the Council after consultation took place with the Parish Councils in February 2014. The site was assessed and consulted upon as part of the Preferred Options consultation. Technical work undertaken more recently has shown that the site is not suitable in landscape terms and therefore the site (COL011) will not be taken forward within the DPD.

The revised site assessment forms submitted by the Parish Council for the various sites within the parish of Cold Ash have been taken into account in revising the site assessments and SA/SEA, where appropriate at this stage.

2. Housing numbers and distribution

Consultation comments:

- HSA DPD based on the housing requirement set out within the Core Strategy falls significantly short of the full objectively assessed needs of the district and cannot be considered sound. Does not meet the guidance set out in paragraph 182 of the National Planning Policy Framework (NPPF).
- Paragraph 47 of NPPF requires local authorities to boost significantly the supply of housing and should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for housing in the market area.
- Work on the Strategic Housing Market Assessment (SHMA) should be completed within 3 years from adoption of the Core Strategy and then to progress a new Local Plan with the revised housing figure. Not, as the Council have stated, to produce a new Local Plan in due course.
- An objectively assessed need (OAN) for the district will be significantly higher than the Core Strategy figure. The Housing Site Allocations (HSA) DPD therefore fails to meet an OAN for West Berkshire.
- Following the approach set out in other appeal decisions, for example Hunston, Nexus Planning believes the Council cannot demonstrate a 5 year supply of deliverable housing sites based on an OAN. Therefore the relevant policies for the supply of housing must be considered out of date.
- A housing figure based on the Regional Spatial Strategy (RSS) should not be relied upon – St Albans case.
- The Core Strategy figure is 'at least' and therefore the Council could and should allocate land with capacity to exceed this figure, especially in sustainable locations.
- Allocations to date have been heavily weighted towards Newbury (Sandleford and the Racecourse), at Thatcham's expense. The allocation of a single site for 87 dwellings does nothing to address this imbalance. Compton, a service village, has a preferred option site for 140 dwellings.
- Thatcham should be allocated a larger housing figure and thus more sites should be allocated in Thatcham.
- In the absence of a comprehensive Local Plan, based on an OAN, the Council should develop a policy steer for development in the absence of a 5 year land supply – to direct development based on sustainability criteria and the existing settlement hierarchy. Suggested policy wording provided.
- To say that Thatcham only needs a small amount of development over the plan period is untrue and unjustified – the Housing Register at April 2010 shows 1,335

households were seeking an affordable unit in Thatcham. The Core Strategy figure is not an OAN, resulting in an under provision of housing sites.

- Thatcham is at the top of the hierarchy and therefore should have a higher proportion of housing allocated to it – the split between Newbury and Thatcham is disproportionate.

Council response:

See Council Response to Sections 1 and 2 of the HSA DPD relating to housing numbers and distribution.

3. Character

Consultation comments:

- The rural character of the site is the same as other greenfield sites. The site is surrounded on three sides by existing development – less intrusive than other sites.

Council response:

One of the strategic objectives for the Core Strategy is to ensure that development is planned in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment across the District. The Core Strategy notes that a key feature of even the larger settlements in West Berkshire is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. New development therefore needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context. Any scheme for a particular site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document.

Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB. The LCA (2015) for this site has concluded that development on the whole of this site would result in harm to the natural beauty and special qualities of the AONB. Cold Ash is an AONB settlement and although it has expanded southwards out of the AONB and down the slope towards Thatcham, it retains a distinctive separate identity. The development of the

whole of this site would lead to the perception of a merging of the two settlements and would therefore have an adverse impact on the AONB settlement pattern.

4. Flood risk

Consultation comments:

- Site is in Flood Zone 1 and therefore not susceptible to flooding. The site could accommodate attenuation ponds to relieve flood risk elsewhere.

Council response

Comments noted.

Whilst the site is within Flood Zone 1, some parts of the site are within an area of surface water flood risk, with significant surface water flows adjacent to the site.

5. Infrastructure

Consultation comments:

- Bus stops are immediately adjacent to the site – railway station is 3.3km away and the town centre is 1.6km away.

Council response

Comments noted.

THA019: Land at Little Copse, Thatcham

Responses received: 2

1. General

Consultation comments:

- Disappointed that the submission to the Council by the Parish Council in March 2014 was not included in the DPD documents. Documents submitted, along with the request to amend the DPD documents to recognise the Parish Councils submission.
- Disappointed that the Parish Council not have a chance to comment on site COL11 – Land at Cold Ash Hill. It is considered that the case against the site is so compelling that if given the chance to comment the site would have been excluded from the consultation.
- Submitted revised site assessment forms, along with Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) assessments and commentary documents for the four sites with Cold Ash Parish: COL002; COL006; COL011; NEW045.
- The rejected sites have also been reassessed and documentation has been submitted for NEW105; THA011; THA014; THA019 and THA027. It is requested that the SA/SEA is updated to reflect the proposed amendments in case the site should be considered in the future.
- The SA/SEA fail to take account of, and list, traffic volume statistics, use loose language describing the proximity of facilities, use general term ‘mitigation measures’ all of which are misleading.
- New site area proposed to provide 25 dwellings rather than the 72 previously proposed.
- The new proposed scheme addresses the Council’s previous concerns over the development of the site and it should be reassessed against the SA/SEA criteria.
- Reducing the proposed development addresses the concerns of the Council and PC regarding the adverse effect on the visual and physical separation of this part of Thatcham from Cold Ash Hill.

Council response:

The consultation information submitted by the Parish Council in March 2014 was considered in assessing all sites within Cold Ash parish. Whilst this information, as submitted, does not form part of the DPD itself it does form part of the Council’s Statement of Consultation published in July 2014 alongside the Housing Site Allocations DPD Preferred Options consultation. The Council acknowledge that in publishing this information Annex A was omitted but this will be rectified as part of the pre-submission version of the Statement of Consultation.

Site COL011 was submitted to the Council after consultation took place with the Parish Councils in February 2014. The site was assessed and consulted upon as part of the Preferred Options consultation. Technical work undertaken more recently has shown that the site is not suitable in landscape terms and therefore the site (COL011) will not be taken forward within the DPD.

The revised site assessment forms submitted by the Parish Council for the various sites within the parish of Cold Ash have been taken into account in revising the site assessments and SA/SEA, where appropriate at this stage.

A new site area has been submitted as part of the Preferred Options consultation and as a result of this submitted information the Council will update the site assessments taking into consideration the smaller area and smaller number of dwellings.

Updated site assessment taking into account the new site proposals and the suggestions put forward by Cold Ash Parish Council can be found within the SA/SEA Report.

2. Flood risk

Consultation comments:

- Western part of the site is no longer available for development as a compensation pond was constructed last year.
- The eastern part of the site remains available.
- The compensation pond is designed to resolve surface water issues and will therefore prevent flooding in future and further S106 contributions can be made to enhance any flood risk mitigation measures.
- The eastern part of the site is at a higher level than the existing surface water ditches along the northern boundary – therefore no surface water flooding issues.

Council response:

Comments noted.

The Council acknowledge that the flood alleviation compensation pond has been constructed on the western part of the site. As a result of this the landowner/agent has submitted a new site area for consideration within the DPD.

3. Distance from centre

Consultation comments:

- The site is close to services and facilities, but some distance from the town centre.
- The site is on the edge of the settlement and therefore when compared to other sites in Cold Ash or Hungerford, there are other sites within similar distances to such services.
- The number of dwellings proposed reduces the weight to be attached to this concern.

Council response:

The site remains on the edge of the settlement and some distance from Thatcham town centre. The proposed reduction in the number of dwellings on the site does not change the location of the site or the weight to be attributed to this consideration.

4. Character / landscape sensitivity

- The site assessments refer to the site as being within an area of medium landscape sensitivity however, the table within the DPD refers to high landscape sensitivity. This needs to be amended.
- The SA states that development of the site would change the rural nature and feel of the area, but the Parish Council comments state that the site offers good visual amenity to the area south of the site.
- Proposed amendments to the scheme should overcome the concerns.

Council response:

The Thatcham Landscape Sensitivity Study (2009) identifies THA019 as sitting within the *Colthrop Manor Plateau Edge (LLCA14F)*. This is an area of medium landscape sensitivity, characterised by its open farmland with major blocks of woodland, and undulating escarpment slopes. Settlement in this area is sparse but the area is an important setting to north Thatcham.

In terms of the wider landscape the study sets out that the area is highly visible from the Kennet Valley and the Greenham escarpment, with localised views from neighbouring areas. The area provides a strong contrast to the more immediate urban form, providing an important setting to Thatcham and a rural transition zone between the urban area and the AONB.

An error has been made within the Preferred Options HSA DPD which incorrectly states that the site is in an area of high landscape sensitivity. This will be corrected in

the pre-submission version. It is important to note however that the site assessment forms make clear that the site is within an area of medium landscape sensitivity.

One of the strategic objectives for the Core Strategy is to ensure that development is planned in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment across the District. The Core Strategy notes that a key feature of even the larger settlements in West Berkshire is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. New development therefore needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context. Any scheme for a particular site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

5. Ecology

Consultation comments:

- Landscape buffers can be incorporated to the land abutting the ancient woodland if required.

Council response:

The SA/SEA and Site Commentary assessment forms make it clear that buffers would be required between any development and Little Copse. The proposed layout plan does not reflect this, and instead places gardens adjacent to the woodland.

Development of the site would result in the copse becoming enclosed, effectively removing it from the countryside and making it an urban woodland. This is considered to be inappropriate. In addition, the northern part of the site contains semi-natural habitats which were protected as part of designing and constructing the compensation pond. Given the proposed layout, development of this site would have a negative impact on these habitats.

6. Access

Consultation comments:

- Access road runs to the north of the compensation pond – see suggested layout plan.
- A second access is proposed via Lawrence Way onto Floral Way – suitable for limited traffic/pedestrian access in its current form.
- Less weight can be given to matters such as limited public transport options, in view of the reduced number of houses now being proposed.

Council response:

Bus stops are located on Floral Way to the south of the site and along Cold Ash Hill. The site remains some distance from the railway station and Thatcham town centre. The proposed reduction in the number of dwellings on the site does not change the accessibility to public transport or the weight to be attributed to this consideration.

THA024: Land to the north of Floral Way and west of Harts Hill Road (Dunston Fields West)

Responses received: 2

1. General

Consultation comments:

- Agree with rejecting this site – it would provide more housing than required for Thatcham.
- Thatcham has seen a lot of development already and the rejected sites should be protected for the rural character, wildlife and environment.
- Site capacity of this site has been miscalculated.
- Development capacity of the site was incorrect in the Strategic Housing Land Availability Assessment (SHLAA) 2013 and the Council were made aware of this but it has not been corrected. The error in the SHLAA appears to have been carried forward into the DPD.
- Request that the site area and capacity is amended to read: developable area 8.4ha (12*0.7), which in turn would give a capacity of 252 (8.4ha at 30 dph). Text in DPD should read the site is capable of accommodating 'up to 250 dwellings'.
- Capacity of the site (at the correct development potential) does not reflect the size of site the Council is seeking to allocate.
- It is not proposed that the site is suitable for this round of allocations; however the landowner would like to promote the site as a considerable allocation. It is requested that the Call for Sites Submission is considered in a justified manner alongside other sites in future consultations.
- Offer to fund Dunston Park Detention Basin as part of the comprehensive development scheme on the site, providing wider community benefits.

Council response:

Comments noted.

The Council acknowledge that the development capacity of the site had been calculated in error. This will be corrected within the site assessments and Housing Site Allocations (HSA) DPD accordingly, and any reference to the development capacity of the site will be amended. The SHLAA will be updated when the next version is published.

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to

2026, along with a spatial distribution to identify where this housing will be provided. The HSA DPD seeks to allocate specific small scale housing sites to meet the remainder of the housing requirement set out within the Council's adopted Core Strategy. It is intended that this will form the first part of the Council's longer term objectively assessed need (OAN).

The consultation response from the site promoter recognises that the scale of the site is larger than the Council are seeking to allocate within Thatcham at this stage. Given the allocation set out within the Core Strategy for Thatcham and recent commitments/completions within the town, a site of this size would need to be considered through the revised Local Plan.

2. Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)

Consultation comments:

Public Transport

- Facilities Plan submitted with THA028 shows the bus stop on the A4 providing frequent services are 800m from the centre of the site. The site assessment states bus stops are around 1 mile from the site.

Ecology

- An updated Great Crested Newt (GCN) Survey has been submitted, concluding that no GCN exist on the site. The Site assessment states that GCN are present on the site.
- An updated Preliminary Ecological Assessment has also been submitted which concludes that there are no ecological constraints to development.

Archaeology

- A Heritage Impact Assessment was undertaken and submitted in 2013 with the SHLAA representation, and concluded that archaeology is not considered to preclude residential development of the site. The site assessment states that the site has potential to constrain development and desk-based heritage assessment would be required.

Council response:

Comments noted.

The bus stops on the A4 are approximately 800m from the site as the crow flies. This distance is extended to approximately a mile should the distance be measured along roads.

Updated technical information is noted and will help inform the development potential of the site in the future.

THA028: Land north of Floral Way and east of Harts Hill Road (Dunston Fields East)

Responses received: 4

1. General

Consultation comments:

- Prefer THA028 as development on this site will not ruin Thatcham Nature Reserve and its wildlife. It has easier access via road and is in a better location for public transport. The site is a big space to accommodate the full 89 houses plus that have been proposed.
- Rejected sites, such as THA028, are better options.
- Agree with rejecting this site – it would provide more housing than required for Thatcham.
- Thatcham has seen a lot of development already and the rejected sites should be protected for the rural character, wildlife and environment.

Council response:

Comments noted.

2. Site Assessment

Consultation comments:

- Inaccurate site assessment leading to the rejection of this site.
- Development capacity of the site has been miscalculated. The Council have admitted to this error.
- The correct site capacity should be 90 dwellings ($4.3\text{ha} \times 0.7 = 3.01 \times 30\text{dph} = 90.3$ dwellings).
- This is 13 dwellings less than that stated within the DPD for the site, but only 3 more than the capacity of THA025 (the preferred site).
- Appendix 9A of the SA outlines that the site as not recommended for allocation due to the development potential of the site being more than required, there are smaller sites considered more suitable and development north of Floral Way would change the character of the built environment.
- Given the development potential on the site, when correctly calculated, is just 3 less than THA025 (preferred site), the reason for rejection relating to the development potential and size of the site is no longer an issue.
- The only other reason cited by the Council, was the likely effect any proposal might have on the character of the area to the north of Floral Way. This appears

to be based on an out of date and inaccurate SHLAA map, which does not show the 24 modern homes and 6,000sqft of commercial buildings to the north of Floral Way and immediately to the west of the subject site (THA028).

- THA028 should be reassessed against THA025.
- Evidence suggests that THA028 is the preferred site for Thatcham as a result of reassessment.
- DPD is unsound as the site assessment process has not been undertaken in a sound and justified manner.
- Updated and submitted reports by the landowner appear to have gone unread by the Council.

Council response:

The Council acknowledge that the development capacity of the site had been calculated in error. This will be corrected within the site assessments and HSA DPD accordingly, and any reference to the development capacity of the site will be amended. The SHLAA will be updated when the next version is published.

The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Report outlines the Council's justification for not taking this site forward as a preferred option. The SA/SEA Report has been updated where necessary taking into account consultation responses at the Preferred Options stage and available information relating to the site, including updated technical information.

3. Land at Lower Way (THA025)

Consultation comments:

- The Council fail to mention the sites proximity to the Site of Special Scientific Interest (SSSI) (Thatcham Reed Beds).
- Potential increase in cars onto Lower Way appears to have been deemed acceptable, even though the road is essentially a slow moving residential street, prone to regular heavy congestion.
- The Council's commentary states that the site is not at risk from flooding. This is contested, and evidence to the contrary is provided in the Flood Risk Critique submitted.
- The site has recent historic records of significant flooding, set out in the Surface Water Management Plan (SWMP) Historic Flood Event Map (submitted).
- The SWMP highlights that THA025 is surrounded not only by surface water flooding possibilities, but also a risk of sewage overflow to the north eastern area of the site.

- It appears to the reader that the site analysis for THA025 has been tailored to achieve a positive stance, whilst that for THA028 is tailored to achieve a negative stance.
- The existence of water bodies in the location of THA025 and the flood zone 3 designation leads to serious flooding in the locality.
- The SWMP states that in 2007 the site and the site area had been subjected to surface water flooding, extending across Lower Way.
- The site is heavily constrained from an ecological perspective by virtue of the site adjoining Thatcham Nature Reserve, which includes Local Wildlife Site, Protected Nature Reserve and a SSSI.
- Lower Way contains traffic calming measure and serves an already built up area.
- Traffic to the sewage works is likely to include HGVs which when combined with additional traffic generation from any proposed development is likely to lead to significant congestion.

Council response:

Comments noted.

See the Council Response for THA025.

4. Development north of Floral Way

Consultation comments:

- Floral Way is not a road reminiscent of a countryside location; it is a major modern day road servicing the town of Thatcham.
- There is already development to the north east of Floral Way, immediately to the west of the site (THA028), consisting of office buildings and dwellings.
- The construction of office buildings is strictly controlled in planning terms due to traffic generation, and although the majority of these office buildings were conversions from agricultural buildings, there were some new build elements. The development was not a concern for this particular area for the Council.
- We do not see how further development would be detrimental to the area, and fail to see the reasoning behind rejecting this site in favour of THA025.

Council response:

Floral Way is a defining feature and acts as the current boundary. If development was to take place north of Floral Way it is preferable to consider all the sites as a whole as part of the next Local Plan, when the area can be planned for holistically, ensuring infrastructure requirements can be delivered to meet the demand from new development, rather than having piecemeal development.

5. Accessibility to services and facilities

Consultation comments:

- Bradley Moore Square Local Centre is located opposite the development site, to the south west of Floral Way. It hosts a convenience store, takeaways, hairdresser, public house community hall and open space.
- The facilities plan submitted with the consultation response displays that the site is accessible to a variety of different areas, including the town centre without the need for a car.

Council response:

Comments noted. The site is in close proximity to some limited services and facilities however the site remains some distance from Thatcham town centre, the railway station and wider services and facilities.

6. Flood Risk

Consultation comments:

- Although no historic evidence of flooding, the Council outlined a mitigation recommendation of a Flood Risk Assessment (FRA) – the absence of which gave the site a score within the SA/SEA.
- A Level 1 FRA has been submitted with the consultation response
- The SWMP indicates that there are no elements of risk located on the site or adjacent to its boundaries. It is suggested the Council revisit the site assessment.
- The Council's Principal Drainage Engineer advised that he had never been consulted on the site THA025, although he had been on other sites in the north of Thatcham.
- The flood Risk Critique carried out and submitted with the consultation response concludes that based solely on the available flood risk information from both the Environment Agency and WBC, the Dunston Fields East site is considered preferable to the Land at Lower Way.

Council response:

The site is located within flood zone 1 with an area of surface water flood risk along Floral Way, adjacent to the site. Updated technical information is noted, and will help inform the development potential of the site.

7. Transport and Highways

Consultation comments:

- Floral Way is more suited to additional traffic flows than Lower Way.
- Floral Way forms part of the strategic road network surrounding Thatcham and its capacity to sustain additional traffic flows is substantial.
- Floral Way is designed to direct traffic away from the town centre, thereby reducing congestion within the town.
- Technical work highlights potential for two accesses to THA028 or a single access and an emergency access – one off Harts Hill Road and one off Floral Way.
- Development of the site would provide an opportunity to reduce vehicular speeds by virtue of a new vehicular access as well potentially providing a dedicated pedestrian crossing/traffic calming measures.

Council response:

Comments noted.

8. Ecology

Consultation comments:

- Ecological surveys provided for the site.
- There are no overriding concerns that would prevent development on the site and mitigation measures are detailed to ensure habitats are preserved.
- It is proposed the development will contain a balancing pond.

Council response:

Comments noted.

9. Character of the area

Consultation comments:

- The area around the site has a distinct urban feel.
- The neighbouring development to the north of Floral Way does not look out of place in this location, and we do not see how any further development would be detrimental to the area.
- Both THA025 and 028 are in areas of medium landscape sensitivity.

- Development will be kept within 93m AOD and with additional planting retaining the landscape sensitivity.
- The proposed site will only be 4.5m higher than the existing development of Harts Hill Road.

Council response:

The Thatcham Landscape Sensitivity Study (2009) identifies THA028 as sitting within the *Colthrop Manor Plateau Edge (LLCA14F)*. This is an area of medium landscape sensitivity, characterised by its open farmland with major blocks of woodland, and undulating escarpment slopes. Settlement in this area is sparse but the area is an important setting to north Thatcham.

In terms of the wider landscape the study sets out that the area is highly visible from the Kennet Valley and the Greenham escarpment, with localised views from neighbouring areas. The area provides a strong contrast to the more immediate urban form, providing an important setting to Thatcham and rural transition zone between the urban area and the AONB.

THA007: Land at Harts Hill

Responses received: 2

1. General

Consultation comments:

- Agree with rejecting this site – it would provide more housing than required for Thatcham.
- Thatcham has seen a lot of development already and the rejected sites should be protected for the rural character, wildlife and environment.

Council response:

Comments noted.

2. Site Selection

Consultation comments:

- Text in DPD providing the list of reasons for rejection of the site differs to that set out within the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) assessments.
- The SA/SEA confirms that there are no overriding reasons for ruling out the development of the site.
- Greenfield sites will be needed in the future so it is inevitable that such sites will not meet all the SA objectives – land to the east of Thatcham is the most suitable.
- The approach to the site selection does not appear to be justified – sites discounted on the basis that Thatcham only needs a small amount of development.

Council response:

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The Housing Site Allocations DPD (HSA DPD) seeks to allocate specific small scale housing sites to meet the remainder of the housing requirement set out within the Council's adopted Core Strategy. It is intended that this will form the first part of the Council's longer term objectively assessed need (OAN).

Given the allocation set out within the Core Strategy for Thatcham and recent commitments/completions within the town, a site of this size would need to be considered through the revised Local Plan.

In terms of landscape, THA007 is identified within the Thatcham Landscape Sensitivity Study (2009) as sitting within the *Colthrop Manor Plateau Edge (LLCA14F)*. This is an area of medium landscape sensitivity, characterised by its open farmland with major blocks of woodland, and undulating escarpment slopes. Settlement in this area is sparse but the area is an important setting to north Thatcham. In terms of the wider landscape the study sets out that the area is highly visible from the Kennet Valley and the Greenham escarpment, with localised views from neighbouring areas. The area provides a strong contrast to the more immediate urban form, providing an important setting to Thatcham and rural transition zone between the urban area and the AONB.

Whilst other reasons for rejecting the site at this stage (for example flood risk, overhead power cables etc) can most likely be overcome through effective mitigation, there is an overriding principle of developing north of Floral Way which is not acceptable at this stage, and would be contrary to the Spatial Strategy of the Core Strategy. It is the Council's preferred approach, in accordance with the Core Strategy, to consider this area as a whole as part of a revised Local Plan, when the area can be holistically planned for ensuring infrastructure requirements can be delivered to meet the demand from new development, rather than large scale development occurring in a piecemeal manner.

It is important to note that the assessment of sites involves more than the SA/SEA matrix. Full site assessments are set out within the SA/SEA Report.

3. Housing numbers and distribution

Consultation comments:

- It is not accepted that just allocating one site in Thatcham is the most appropriate strategy to ensure the District's full objectively assessed need (OAN) is adequately addressed.
- The Inspector's Report makes clear that Thatcham should be considered again for additional housing growth given its position within the top tier of the hierarchy.
- The Council's focus should be on reviewing housing need and ensuring it has a 5 yr supply of deliverable sites. It is unsound to dismiss housing sites in Thatcham on the basis that Thatcham only needs a small amount of development – Hunston case.
- Does not provide an OAN and therefore does not have a 5yr land supply.

- The HSA should be postponed until a full OAN is sought. If the Housing Site Allocations (HSA) DPD proceeds then further sites should be allocated in Thatcham to provide greater flexibility.

Council response:

See Council Response to chapters 1 and 2 of the HSA DPD relating to housing numbers and distribution.

THA008: Land at Siege Cross Farm

Responses received: 2

1. General

Consultation comments:

- Agree with rejecting this site – it would provide more housing than required for Thatcham.
- Thatcham has seen a lot of development already and the rejected sites should be protected for the rural character, wildlife and environment.

Council response:

Comments noted.

2. Housing numbers and distribution

Consultation comments:

- Core Strategy housing figure does not provide an objectively assessed need (OAN) in accordance with the National Planning Policy Framework (NPPF).
- Figures not up to date and the Inspector for the Core Strategy indicated that based on population projections available at the time that a figure closer to 16,000 may be more appropriate.
- The Housing Site Allocations (HSA) DPD does not meet the full OAN, instead leaving this to a plan review.
- Concerns with the Background Paper supporting the HSA – does not accurately reflect the National Planning Policy Framework (NPPF) – paragraph 47 to boost significantly the supply of housing using evidence to meet the full OAN.
- Concerns over the approach taken by preparing a HSA DPD and meeting the first part of the housing requirement, with the remainder to be allocated through a review of the Local Plan.
- As the Core Strategy does not provide an up to date OAN there is a significant degree of unmet need (backlog) which is restricting access to housing – the HSA DPD is failing to put in place a strategy to meet the need and redress the ongoing backlog.
- Adoption of the HSA DPD would render the policies immediately out of date, under paragraph 49 of NPPF.
- 2011 based interim household projections demonstrate a significantly higher housing target than the 525 currently being planned for – identifying 710 new households per annum 2011 -2021.

- Barton Willmore has produced its own assessment of need. Taking an economic-led approach the Council should be planning for a minimum of 1,102 dwellings pa between 2011 and 2031. Demonstrating a significant shortfall each year and over the plan period.
- As such the Council cannot claim to be meeting the first part of the requirement through the HSA DPD because there is such a significant shortfall each year that even delivering 525pa still does not meet the requirements for the district.
- By delivering low levels of housing the Council is not meeting the objectives set out within the Core Strategy.
- Failing to delivery higher levels of housing in Thatcham, would result in a declining child age and a declining working age population – which is contrary to the objectives for Thatcham within Core Strategy as a thriving retail and leisure destination.
- Barton Willmore state that the requirement should be a minimum of 138 dwellings pa between 2011 – 2031 in Thatcham – resulting in an overall requirement of 2295 dwellings to 2026.
- The Council should use the updated Strategic Housing Market Assessment (SHMA) to inform a whole or partial review of the Core Strategy and prepare a new Local Plan to meet the full OAN. However, it is important to bring forward land for development and therefore it may be most appropriate to allocate additional land through the HSA DPD as an interim position to meet the housing needs in the area until a review of the Local Plan can take place. If no additional sites are brought forward within the HSA DPD then it needs to be acknowledged that the HSA DPD does not comply with paragraph 47 of the NPPF.

Council response

See Council Response to Sections 1 and 2 of the HSA DPD relating to housing numbers and distribution.

3. Site assessment

Consultation comments:

- Thatcham needs more housing than that being planned for – will not meet the needs of natural change.
- Goes back over the figures above for Thatcham of 138 pa and therefore 2295 to 2026 which equates to 1395 more than are being provided for.
- Site is in Flood Zone 1 and therefore at low risk of flooding. Although surface water flood route crosses the site this has been taken into consideration in the proposals and should not be a reason for rejection.
- Proposed drainage strategy takes full account of overland flows and would therefore contribute to a reduction in flood risk.

- Ecological potential has been fully assessed as part of the proposals, and the relevant mitigation and enhancement measures proposed. The presence of protected species should not be a reason for rejection.
- Council's assessment concludes that the site of high archaeological potential, however the Council's Archaeological Officer has already agreed that the site is of low archaeological potential. The assessment should be revised.
- The Council note the overhead power lines as a constraint, but these have been taken into account in the proposals and as such the existing power lines are to be diverted. This is not a reason to reject the site.
- It is unclear how the figure of 353 dwellings for the site has been derived. The site has always been promoted for up to 500 dwellings.

Council response

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The Housing Site Allocations DPD (HSA DPD) seeks to allocate specific small scale housing sites to meet the remainder of the housing requirement set out within the Council's adopted Core Strategy. It is intended that this will form the first part of the Council's longer term objectively assessed need (OAN).

Given the allocation set out within the Core Strategy for Thatcham and recent commitments/completions within the town, a site of this size would need to be considered through the revised Local Plan.

In terms of landscape, THA007 is identified within the Thatcham Landscape Sensitivity Study (2009) as sitting within the *Colthrop Manor Plateau Edge (LLCA14F)*. This is an area of medium landscape sensitivity, characterised by its open farmland with major blocks of woodland, and undulating escarpment slopes. Settlement in this area is sparse but the area is an important setting to north Thatcham. In terms of the wider landscape the study sets out that the area is highly visible from the Kennet Valley and the Greenham escarpment, with localised views from neighbouring areas. The area provides a strong contrast to the more immediate urban form, providing an important setting to Thatcham and rural transition zone between the urban area and the AONB.

Whilst other reasons for rejecting the site at this stage (for example flood risk, overhead power cables etc) can most likely be overcome through effective mitigation, there is an overriding principle of developing north of Floral Way which is not acceptable at this stage, and would be contrary to the Spatial Strategy of the Core Strategy. It is the Council's preferred approach, in accordance with the Core

Strategy, to consider this area as a whole as part of a revised Local Plan, when the area can be holistically planned for ensuring infrastructure requirements can be delivered to meet the demand from new development, rather than large scale development occurring in a piecemeal manner.

It is important to note that the assessment of sites involves more than the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) matrix. Full site assessments are set out within the SA/SEA Report.

With regard to the development potential stated within the site assessments and Preferred Options DPD, the number has been calculated in the following manner. The Strategic Housing Land Availability Assessment (SHLAA) (2013) form submitted to the Council stated that 16.8ha of the site was suitable for development. Paragraph 3.24 of the SHLAA then outlines that 'on larger sites the net site area was reduced to more accurately reflect allowances required to provide for other uses such as open space or community facilities'. As such, 70% of the site was then taken forward within the SHLAA as the developable area ($16.8 \times 0.7 = 11.76$). In accordance with the SHLAA methodology a pattern book density was then applied to the developable area to give the development potential on the site ($11.76 \times 30\text{dph} = 353$). This is a consistent approach taken to all sites.

4. Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)

Consultation comments:

- Amendments required to the SA/SEA as follows:
- (Section B) Pavement is present along the northern side of Bath Road, along the southern edge of the site. Assessment should be updated. (Section B) There is no right of way across the site. Assessment should be updated.
- Criterion 2 – uncertain score – draft proposals incorporate substantial areas of open space and therefore a positive score should be given.
- Criterion 3 – positive score – draft proposals comprise a primary school and community facility which represent significant benefits to the community – double positive should be given.
- Criterion 4 Mitigation and enhancement column - this should be updated to reflect the proposals for new footway/cycleway across A4. Criterion 4 – uncertain score – this should be a positive score given the proposals to improve junction arrangements and pedestrian crossing facilities. Criterion 5 – negative score – if mitigation is provided through a 15 metre buffer etc, this would change the score to positive. Amend this score.
- Criterion 5 – mitigation and enhancements column and comment column should include reference to the proposed landscaping which will reduce the impact of the site. The scheme would have limited impact on landscape character.

- Criterion 6 – negative score – given the site has a strong affinity with the existing settlement edge rather than wider countryside, and follows the existing settlement pattern of the Kennet Valley floor, the score should be neutral.
- Criterion 6 – uncertain score – the site does not have high archaeological potential and therefore a neutral score should be given.
- Criterion 10 – neutral score – proposed drainage strategy reduces peak flows from the site, takes into account overland flows and provides possibility of additional attenuation ponds to reduce flood risk therefore should be a positive score.
- Reasons for rejection of the Siege Cross site are not appropriate.

Council response:

The SA/SEA matrix has been carried out in a consistent manner across all sites. The matrix which can be found as part of the SA/SEA Report forms part of the site assessments. This element of the site assessment has been completed using the red line boundary of the site as it is. Any mitigation measure proposed by the site promoter to overcome existing constraints can be set out within the 'Mitigation/enhancement' column. Such mitigation does not alter the SA/SEA score set out within 'Effects of option on SA objectives'. Should any mitigation be proposed then the 'Comment' column and Summary box can outline that should such mitigation be implemented there is the potential to reduce the impact on sustainability.

The Council have updated the site assessments where appropriate in light of the comments set out within the consultation response.

Detailed SA/SEA points:

Consultation comments:

Flood Risk

- Site is in flood zone 1 and therefore at low risk of flooding. A surface water route crosses the site, but this has been factored into the draft proposals – should not be a reason for rejection. Proposed drainage reduces peak flows and additional attenuation ponds proposed if required. No justification of rejecting the site on flood risk grounds.

Ecology

- Mitigation measures have been put in place via the draft proposals to take into account the protected species on the site, and this should not be a reason for rejection.

Archaeology

- The site is not of high archaeological potential. WBC archaeology officer has agreed with agent that site is low archaeological potential.

Overhead power lines

- The presence of overhead power lines has been factored into the draft proposals for the site which includes diverting the power lines. This should not be a reason for rejection.

Council response

See comments relating to SA/SEA above.

SHLAA Sites (not in Housing Site Allocations DPD and previously assessed)

THA006 : Land at Lower Way, Thatcham

Responses received: 1

Consultation comments:

1. General

- Submitted site layout plan demonstrates the site can accommodate up to 50 dwellings, with open space, habitat enhancement and new footpaths.
- Site is on the edge of existing built up area in a highly sustainable location, with existing development to the east and west of the site
- The site is rough grassland – of no particular landscape value
- The site is accessible – bus route along Lower Way, cycle route and has an existing access
- Significant rising main crosses the site parallel with Lower Way – constrains development
- Limited heritage interest – the immediate setting of the farmhouse and an appreciation of the historic field pattern can be retained as part of the proposed development.

2. Ecology

- Ecology Note has been submitted
- The site is of no special ecological significance – Technical Note submitted re: ecology. The site is not a nature reserve, nor does it have a statutory designation, but the site is close to Thatcham Reed Beds, Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR). Site is semi-improved grassland, heavily colonised by evasive vegetation. There are opportunities to enhance/retain ecological features.

3. Flood risk

- Flood Risk Assessment submitted
- Southern parts of site are within Flood Zones 2 and 3. FRA submitted - shows the northern parts of the site are within Flood Zone 3 and therefore providing all development is limited to the northern parts there is a low risk of flooding.

Council response:

Comments noted.

Ecology information has been noted, and the information will help inform the development potential of the site.

The southern part of the site is within flood zones 2 and 3, with areas of surface water flood risk along Lower Way adjacent to the site. The Environment Agency has advised against any development within flood zones 2 and 3 and this would limit the development potential to the northern areas of the site.

The consultation response states that the northern parts of the site are within flood zone 3, but it is assumed this is a typo as the northern parts of the site are within flood zone 1, and therefore at low risk of flooding.

THA004: Land at Rainsford Farm, Thatcham

Responses received: 1

Consultation comments:

1. General

- Large brownfield site promoted for approx. 851 residential units – see attached Masterplan.
- The site would deliver housing, community facilities, new school, playing fields, open space, retail and a marina.
- Brownfield site with relatively few constraints. Main considerations being, contamination and flood risk.
- The development of the site could deliver a bridge linking Station Road to Crookham Hill via Pipers Way – assisting with the current issues with the Level Crossing.

2. Approach to housing delivery

- Housing Site Allocations (HSA) DPD is not justified and the piecemeal delivery of smaller sites is considered contrary to the NPPF.
- Object to the piecemeal allocation of small development sites rather than a longer term strategic and comprehensive site. The amount of resources required to implement a plan for smaller sites would appear to be an unbalanced scale of economy given the number of inevitable negotiations.
- A number of smaller sites could also lead to delivery issues and piecemeal sprawl of rural settlements, especially in the AONB.

Council response

Comments noted.

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The Housing Site Allocations DPD (HSA DPD) seeks to allocate specific small scale housing sites to meet the remainder of the housing requirement set out within the Council's adopted Core Strategy. It is intended that this will form the first part of the Council's objectively assessed need (OAN).

Sites will be allocated in accordance with the spatial strategy and settlement hierarchy as identified within the Core Strategy. As such, a site of this scale would not be considered as part of the HSA DPD as it would be deemed to be strategic in nature. A site of this size would need to be considered through the revised Local Plan, if the existing constraints can be overcome.

General Comments on all rejected sites

Responses received: 3

1. General

- Reasons for rejection of sites are sound and I trust these will not be diluted by any inappropriate challenges.
- Good to see flood risk in the area is now being properly taken into account.
- Pleasing that sites which would have involved the loss of productive agricultural land have been rejected. These are in many cases an example of speculative development.
- Any further development in north Thatcham, north of Floral Way, would be detrimental to the rural landscape of this area.
- Floral Way should be retained as the settlement boundary.
- Support decision to reject the sites.
- The provision of health services need to be taken into consideration and built into plans for any future large housing developments.
- The preferred option site (THA025), although this would fall within the Burdwood Surgery boundaries, will have an impact on both practices in Thatcham at a time when we are already stretched.

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Cold Ash General Comments

Responses received: 4

1. Flooding

Consultation comments:

- The Parish is built mainly on a ridge escarpment, the geology of which means that there is a history of flooding downhill from the main village, both from surface water run-off and ground water (2007 and 2014) to Newbury and Thatcham. Current flood retention ponds at the bottom of Cold Ash Hill, on the northern border of Thatcham, are specified for the existing run-off volumes. Any additional building in above these ponds will only add to the problem.

Council response:

Comments noted.

The concerns the community have regarding potential flooding issues are recognised. A Flood Risk Assessment (FRA) in accordance with Core Strategy policy CS16 would be required for any of the sites proposed for allocation in Cold Ash. This would need to clearly show how the development would not impact on flood flows. Appropriate flood mitigation measures, including SuDS would also be required.

2. Highways and road safety

Consultation comments:

- Traffic is already a problem within and through the Parish. Hermitage Road, The Ridge, Ashmore Green Road, Stoney Lane and Fishers Lane are old farm tracks with poorly constructed paving to carry the now substantial volume of traffic using these roads as rat runs to the M4 and A34 and Newbury. Additional traffic volume would overwhelm the Parish and cause substantial deterioration in the quality of life for the Parishioners.
- Infilling in recent years has meant an increase in traffic through the village which is often used as a rat run for the A34 and M4.
- Roads are often narrow and rural in nature and will struggle to cope with additional traffic, especially lorries.

Council response:

Comments noted.

The particular characteristics and limitations of the road layout within the parish are recognised. However, the traffic generated from the level of development proposed

for Cold Ash is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

3. Infrastructure

Consultation comments:

- Infrastructure – concern that any expansion to the north of Thatcham will put extra pressure on the school in Cold Ash
- Impact of additional development on the existing infrastructure, including the school, water and electricity supply.

Council response:

Comments noted.

Existing pressure on local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

4. Loss of rural character

Consultation comments:

- Cold Ash is on a ridge adjacent to the AONB. National Planning Policy Framework guidelines state that highly visible areas such as exposed ridges,

landforms and open slopes should normally be protected. Areas of sporadic dispersed or ribbon development should normally be excluded from development. The wider setting and important views should be taken into account when proposing development.

- Concern that Cold Ash will lose its identity and merge into Thatcham.
- Village is in the setting of the AONB
- Erosion of overall quality of life
- The settlement boundary of Cold Ash should be redrawn to include site COL009 and the site should be considered for development.

Council response:

Comments noted.

Cold Ash sits on the southern edge of the North Wessex Downs AONB, with much of the village just outside the boundary and only the houses to the east of The Ridge within the boundary. Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB.

One of the strategic objectives for the Core Strategy is to ensure that development is planned in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment across the District. The Core Strategy notes that a key feature of even the larger settlements in West Berkshire is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. New development therefore needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context. Any scheme for a particular site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

Following the preferred options consultation the settlement boundary for Cold Ash was reviewed in accordance with the finalised settlement boundary review criteria and it is proposed to be redrawn around the developable area of any allocated sites only.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

COL002: Land at Poplar Farm, Cold Ash

Responses received: 40

1. Development in principle

Consultation comments:

- The demand for housing should be met through more development on brownfield land and the redevelopment of currently derelict properties
- Villages in general should not be the preferred option. In towns and cities there are many disused buildings and areas of land that are centrally located and ideal for development with the majority of utilities already in situ, making costs lower.
- Concern about the principle of additional development in the village and that any future developments would have an adverse impact on the overall quality of village life
- Concern about the principle of additional development in the village when there are brownfield sites in areas with a better infrastructure
- Urban development is unnecessary
- I understand that it is only sites of over 10 houses which are considered when accounting for the number of homes West Berkshire was told it needed to build in the Local Plan of 2006. In larger towns and cities this may be an acceptable calculation, but in rural West Berkshire, the total number of new homes in villages should be considered as even small developments in these areas can have a huge impact on the local infrastructure.
- Concern that development on part of the site would set a precedent so that development on the remainder would be hard to resist.
- There are more suitable sites in the village such as COL010
- It is indicated that 21 units may be developed but from where has that figure been derived and could it be more?
- Are these properties to be private sale, shared ownership or a mixture of both?
- The Parish Council submits that consideration should be given to a small number of starter homes along the entrance track to Poplar Farm. This would not detract from the rural gap between Ashmore Green and Cold Ash. Also it would not cause the flooding issues with the existing proposal.
- Concern about the possibility of the site being used to accommodate Gypsies, Travellers and Travelling Showpeople

Council response:

Comments noted.

The West Berkshire Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The role of the strategy is to achieve an appropriate balance between protection of the District's environmental assets and improving the quality of life for all, ensuring that

necessary change and development is sustainable in the interests of future generations. Not all development can be accommodated within the District's urban areas, and this would not be the best approach to meeting housing needs across West Berkshire as a whole. However, urban development will be maximised.

The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The spatial strategy builds on the existing settlement pattern, with a particular focus on Newbury as the District's administrative centre and on other sustainable urban areas. The aim is to maintain a network of sustainable communities, meeting the needs of communities while protecting and enhancing the environmental assets of the District. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Cold Ash as a service village within a Settlement Hierarchy. This means that Cold Ash, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Cold Ash will accommodate some additional housing growth to 2026.

The Council monitors the total number of dwellings built across the District on an annual basis through its Annual Monitoring Report (AMR). All new dwellings are included in this calculation, regardless of the size of the site.

There were a number of sites in Cold Ash promoted as part of the Strategic Housing Land Availability Assessment (SHLAA) process. Of these, four were considered to be potentially developable with choices to be made through the plan led process. The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Environmental Report sets out in full how this decision was made.

Cold Ash sits on the southern edge of the North Wessex Downs AONB, with much of the village just outside the boundary and only the houses to the north and east of The Ridge within the boundary. Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB. The LCA (2014) for COL010 concluded that development on the site would cause harm to the natural beauty and special qualities of the AONB.

The estimation of the housing potential for the site was determined using a pattern book approach. It is recognised that this does not give as detailed an estimate compared to a design approach but at a strategic level is considered a robust and expedient method. Should the site be proposed for allocation, the final capacity for the site would be determined following the outcome of further detailed technical work. New development needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context and any scheme put forward for the site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

Methods for securing affordable housing as an element of market housing have been well established and provision will be sought in accordance with Core Strategy policy CS6.

The parish council's proposal for starter homes along the entrance track to Poplar Farm is noted. This area lies within the settlement boundary though and so would not be considered as part of this process as there is already a presumption in favour of development in this location.

This site is not being considered as a potential site to meet the needs of Gypsies and Travellers or Travelling Showpeople.

2. Consultation process

Consultation comments:

- Found it difficult to comment due to the lack of specific information about the nature of any potential development
- Additional information submitted by the Parish Council on 7 March 2014 was not included in the published consultation documents.

Council response:

Comments noted.

The Council took the decision to give the public an opportunity to comment at an early stage of the plan making process. The Preferred Options was an optional period of consultation but the Council considers it is important to be able to take the public's views into account before final decisions are made. Once the Council has taken the decision in principle to allocate sites, further more detailed proposals will be set out in a policy to guide the development of the site and taken forward at the planning application stage.

The submission made by the Parish Council on 7 March has been checked and it can be confirmed that the information contained in Annexes B C and D was included in the Consultation Statement. Annex A was omitted though and we apologise for this. Appendix 2 of the Consultation Statement submitted to the Secretary of State will therefore be updated to include this. Assurances can be given that the information contained in Annex A was taken into consideration as part of the site selection process. (An update also needs to be made to the Thatcham (Cold Ash) 5 February 2014 notes)

3. Flooding

Consultation comments:

- Flooding concerns as land next to Orchard End flooded Jan-March 2014

- Flooding – thick layer of clay means the site is liable to flooding from surface water. Site acts as an important natural buffer for surface water run off from Cold Ash Hill
- Cold Ash Hill is a natural funnel which is particularly prone to flooding
- Poplar Farm is surrounded by inclines that converge into a clay basin. Water naturally accumulates there when it rains. When the water rises high enough, which can happen quite quickly, it floods the road.
- This site has a significant risk and history of flooding, both surface water and groundwater; the properties adjoining this site, downhill onto Cold Ash Hill, were flooded in 2007 and 2014 raising concern that increased surface runoff from a development uphill from these properties will cause flooding. The slopes of the proposed development are wet throughout the winter with livestock having to be moved due to surface standing water.
- Flooding issue - the 2007 summer floods, caused a considerable amount of damage to properties just south of the field where access to the site is proposed.
- Cold Ash Hill has been badly flooded in the past and Poplar Farm appears to bear the brunt of it in such conditions.
- Concern that development would increase flooding both on the site and the surrounding area
- Site has a high water table and is subject to flooding, with no protection from the recently constructed flood prevention measures
- Additional strain put on recently installed flood prevention works
- Concern about flooding and surface water run off as the site forms a natural buffer for run off from Cold Ash Hill.
- COL002 suffered from surface water flooding earlier this year due to run off from the north. Further development of green land in Cold Ash can only increase the risk of flooding. The new attenuation pond at the bottom of Cold Ash Hill is only designed to protect properties on that side of the road.
- Flooding and drainage concerns and the land currently acts as a buffer for surface water runoff from the old chicken farm in Ashmore Green
- With the introduction of concrete foundations and roadways the risk of serious flooding with no soakaway is apparent. Water poured downhill from Cold Ash to Thatcham in the 2007 floods and if houses are built in this proposed position it will flood through them as well because of their poor location.
- The site is in the line of downhill surface water flows which has led to the land and houses in and around the site being badly flooded in the past. Building here will cause greater run-off from the site, endangering surrounding houses.
- Additional strain put on recently installed flood prevention works

Council response:

Comments noted.

It is acknowledged that the site and adjacent properties to the east and south along Cold Ash Hill are susceptible to surface water flooding (surface water flow path from the north) so safe flow routes would have to be provided through the site as part of any development. A Flood Risk Assessment would be required and appropriate flood mitigation measures, including Sustainable Drainage Methods (SuDS), in accordance with Core Strategy policy CS16, would need to be put in place as part of

any proposed development scheme. Details of this would come forward as part of a planning application.

4. Highways and road safety

Consultation comments:

- Road safety concerns for both road users and pedestrians from any additional increase in the volume of traffic. Roads through the village are already very busy, especially around the St. Mark's School and the Post Office
- Road safety concerns for both road users and pedestrians due to narrow pavements.
- The impact of the increase in the volume and speed of traffic along Cold Ash Hill which is used as a short cut for drivers wishing to reach the A34 and M4.
- Concern about the inadequate sight lines on Cold Ash Hill.
- Cold Ash Hill is of insufficient width and traffic capacity to sustain additional residential traffic. Traffic speeds on Cold Ash Hill are already excessive.
- Road safety - For those walking it is only Cold Ash Hill/Hermitage Road where there are pavements. With the volume speed of traffic many parents feel the need to drive to school to deliver their child safely, creating extra traffic movements. It can also be difficult to cross safely at busy times. For cyclists it can also be quite hazardous at busy times due to the high hedges and poor visibility as well as the speed and volume of traffic.
- Concern about additional parking outside the village shop where cars already queue on Cold Ash Hill to access parking particularly on weekend mornings. An access point at this 'traffic blackspot' on Cold Ash would further impact traffic issues. The village road infrastructure would be seriously strained.
- Access needs to be carefully considered and suggests it could be linked to Stroud Meadow opposite the Post Office.
- Inadequate access via single track farm lane. Would require significant work to be undertaken in order to create a useable entrance and exit from Cold Ash Hill
- The access to the development if via the existing farm track would significantly increase the risk of accidents at the junction between Collaroy Rd and Cold Ash Hill which is already a busy junction
- The sight lines from the existing access to site COL002 are very limited. With the opposing access to Collaroy Road already being a blind exit, this crossroads could become a dangerous accident hotspot.
- Concerns about access to the site particularly if it is through Strouds Meadow as it too narrow and hilly
- The entrance to the farm from Cold Ash Hill is set back, and when descending the hill cannot be seen due to the camber of the road. It would be a similar situation if a new entrance were to be created further down below Orchard End.
- The existing entrance) is very narrow and directly opposite Collaroy Road which itself is quite a dangerous junction. If the intention would be to put a new roadway in through The Paddock below the farm then this would give rise to possible flooding issues as The Paddock is known to be very wet. Putting a roadway through that land could increase the risk of flooding to the properties south of The Paddock.
- Current 2 hourly bus service is inadequate to encourage non car based travel

- A community led peak period mini bus service has been encouraged but not taken up
- Any development in Cold Ash should be used as an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Council response:

Comments noted.

The particular characteristics and limitations of the road layout within the parish are recognised. However, the traffic generated from the level of development proposed for Cold Ash is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

5. Impact on heritage assets

Consultation comments:

- The development of this site has the potential to adversely affect the significance of Poplar Farmhouse. The farmhouse should be conserved in any new development.
- Poplar Farm has been owned by the Collins family for over a century, and they run a traditional carriage business from it. The farm is part of the village history and to turn it from a farm to residential estate would be a great loss.
- The scale of the proposed development on the setting of the listed building and the general setting and character of the farm buildings and outbuildings.

Council response:

Comments noted.

Poplar Farmhouse is a Grade II listed building on the site and is part of a historic farmstead. A heritage impact assessment would be required to assess the impact of development on the heritage asset. Development would need to ensure the conservation and enhancement of the asset and its setting in accordance with Core Strategy policy CS19.

6. Infrastructure

Consultation comments:

- Impact on local services, particularly doctor's surgery and hospital
- Schools are at capacity
- Impact on village services, especially St Finian's School and the pre-school at Acland Hall
- Impact on St Marks CE Primary School both in terms of pupil numbers and traffic

- Substantial upgrades would be needed to the local power network
- Overhead power lines traverse the area proposed for housing. How will these be affected if a development is built?
- Inadequate infrastructure
- What local benefits can be gained via a section 106 or commuted sum for the local community?
- Recommend that we liaise with Thames Water to ensure that the impact of new development and any upgrades that may be required to the sewer network are understood, either through the production of a drainage strategy or the provision of a connection to the sewerage system at the nearest point of adequate capacity
- Wastewater and drainage infrastructure concerns appear to have been ignored.
- Drainage already at capacity in the village
- Increase in noise
- If the farm goes then there will have to be lengthy and costly decontamination work carried out, all adding to the feasibility.
- Consideration should be given to the lighting provision as at present Cold Ash generally has little external lighting.

Council response:

Comments noted.

Existing pressure on some local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Thames Water has not raised any concerns regarding water supply/waste water services for the site.

The Council's Environmental Health Team has not identified any air, noise or contamination issues relating to the site to date. Should the site be allocated and they are later identified as potential issues, the Council would request a Contamination Assessment at the planning application stage.

New development needs to be appropriate in terms of its design (which would include consideration of such issues as external lighting and the potential impact of any overhead cables) and any scheme put forward for the site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design SPD.

7. Loss of rural character

Consultation comments:

- Loss of the rural character and separate identity of the village as it merges into Thatcham
- Concern that the sites being put forward are in the south of the village which increases the likelihood of the village merging with Thatcham
- Cold Ash Village will be swamped by this number of houses - there are sites closer to Thatcham, Floral Way for instance, where 20 houses will have much less of an impact.
- Erosion of open countryside between Cold Ash and Ashmore Green
- Development would be out of keeping with the existing settlement pattern
- Loss of views
- Impact on the AONB
- The land is used by the local community for walking and grazing. Dedicated footpaths and rambling rights cross through the proposed development to Ashmore Green.
- Impact on local wildlife, particularly bats and newts around Collaroy Road and St Finian's Farm.

Council response:

Comments noted.

One of the strategic objectives for the Core Strategy is to ensure that development is planned in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment across the District. The Core Strategy notes that a key feature of even the larger settlements in West Berkshire is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. New development therefore needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context. Any scheme for a particular site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design SPD.

Cold Ash sits on the southern edge of the North Wessex Downs AONB, with much of the village just outside the boundary and only the houses to the north and east of

The Ridge within the boundary. Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB.

The LCA (2015) for COL002 indicates that development on part of the site would be considered acceptable subject to certain protection and enhancement measures. Development should be contained on the lower ground in the north east of the site and only extend up the valley side in the area already containing the barns. This would avoid affecting the linear, valley bottom settlement pattern and open landscape at the southern end of the village.

An extended phase 1 habitat survey would be required as part of any planning application, together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected

8. Comments from the site promoter

- The site is well related to the existing settlement and is in close proximity to village services and facilities. The site adjoins existing residential properties along Cold Ash Hill to the east and at Strouds Meadow to the north. The development of the site would provide a natural and logical continuation of residential development in this location. The site is visually well contained, screened by existing trees, hedgerow and planting particularly along its eastern and northern boundaries. There are no known constraints which would impact on the availability, suitability or achievability of development on the site.
- The site provides the opportunity to enhance the existing landscaping framework to soften development. Land adjoining the site to the west is within the ownership of our client, and could assist with the provision of landscaping/ infrastructure.
- The existing access to the site is from Cold Ash Hill to the east. This could be upgraded to provide improved vehicular access to the site. Other alternative accesses (further north and south) could also potentially be used, including for access on foot/ bicycle.
- Land to the south of the existing access and south of Orchard End are also within family ownership and are also potentially developable.

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

COL006: St Gabriel's Farm, Cold Ash

Responses received: 29

1. Development in principle

Consultation comments:

- Concern about the principle of additional development in the village and the adverse impact on the overall quality of village life
- The small number of properties targeted for COL006 would be more sustainably achieved within one of the larger assessed sites.
- The houses are neither needed by the community nor make a significant contribution to the district's housing requirements.
- Development on part of the field would set a precedent so that development on the remainder would be hard to resist.
- Alternative sites should be explored in other parts of the district that are not greenfield sites and which would not affect the AONB.
- Concern over lack of affordable housing in the village
- It would appear that a significant proportion of Thatcham's Spatial Area housing requirement has already been achieved and that the proposed allocations within the urban confines of Thatcham are sufficient to meet the modest shortfall (100 units) over the remaining plan period.
- Service Villages are intended to accommodate more limited development appropriate to the character and function of the village, in order to meet local needs. COL006 is not appropriate to the character of the village with no evidence provided to demonstrate the housing proposed (quantum or anticipated size/tenure) would meet local needs.

Council response:

Comments noted.

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The role of the strategy is to achieve an appropriate balance between protection of the District's environmental assets and improving the quality of life for all, ensuring that necessary change and development is sustainable in the interests of future generations. Not all development can be accommodated within the District's urban areas, and this would not be the best approach to meeting housing needs across West Berkshire as a whole. However, urban development will be maximised.

The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The spatial strategy builds on the existing settlement pattern, with a particular focus on Newbury as the District's administrative centre and on other sustainable urban areas. The aim is to maintain a network of sustainable communities, meeting the needs of

communities while protecting and enhancing the environmental assets of the District. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Cold Ash as a service village within a Settlement Hierarchy. This means that Cold Ash, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Cold Ash will accommodate some additional housing growth to 2026.

It is acknowledged that the District is an area of high property prices compared to levels of income. Methods for securing affordable housing as an element of market housing have been well established and provision will be sought in accordance with Core Strategy policy CS6.

2. Consultation process

Consultation comments:

- Additional information submitted by the Parish Council on 7 March 2014 was not included in the published consultation documents.

Council response:

Comments noted. The submission made by the Parish Council on 7 March has been checked and it can be confirmed that the information contained in Annexes B, C and D was included in the Consultation Statement. Annex A was omitted though and we apologise for this. Appendix 2 of the Consultation Statement submitted to the Secretary of State will therefore be updated to include this. Assurances can be given that the information contained in Annex A was taken into consideration as part of the site selection process. (An update also needs to be made to the Thatcham (Cold Ash) 5 February 2014 notes)

3. Design and density

Consultation comments:

- The village is characterised, in this locale, by detached properties of good spacing interspersed with mature trees and hedgerows - each property being of independent design. The proposed site road frontage raises doubts whether six properties of similar character could be established and retain the linear structure of the village at that point.
- Existing housing along The Ridge is loose knit and low density and there is a stark contrast between this and the much tighter pattern of development within the village core along Cold Ash Hill. This more fragmented pattern of housing characterises The Ridge, with mature treed frontages and spacious gardens between buildings. The architectural styles of buildings have evolved organically over time resulting in diverse styles of property rather than any 'collective developments'.
- Allocation of the site would likely result in a collectively designed development. Such an enclave of similar designed properties would be in stark contrast to the diverse and more individual mix of housing that currently typifies The Ridge and

which was identified in the Landscape Capacity Assessment (LCA) as a key settlement requirement. This is particularly evident in the age and style of the properties around the proposed site. These include a number of bungalows and post war dwellings, the gothic architectural style of St Finian's Convent and the modern, although rustic design of St Finian's Primary School. All of these contrasting architectural styles and varying scales of built form add to the diverse and varied character of the village fringe. Any collective development on the St Gabriel's farm site would relate poorly with the main built form of the existing settlement and would degrade the rural approach into Cold Ash from Upper Bucklebury to the east.

- The allocation is described as "low density" but the proposal is for 6 houses in half a hectare; this is not in keeping with the surrounding properties, which tend to occupy a 0.5 - 1 acre plot per property. Any proposed development should be sympathetic to the surrounding properties and the village itself;
- If this allocation is deemed necessary, our preferred alternative approach would be to reduce the proposed number of houses along with a condition they are not all of the same build, so to complement the surrounding properties and be in keeping with the existing housing along the Ridge.
- Proposed density of housing is not in keeping with existing properties along the Ridge;
- This proposal is considered to be in keeping with the nature of the village.

Council response:

Comments noted.

New development needs to be appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and context. Any scheme for a particular site would therefore need to be in accordance with policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

The Landscape Capacity Assessment (2015) for COL006 indicates that development the site would be considered acceptable without harm to the setting of the AONB provided an opportunity to retain views southwards towards the Kennet valley is included within the development layout and the rural character of this approach to Cold Ash is conserved and enhanced.

A linear development reflecting the existing built form is considered acceptable subject to the provision of:

- A gap in the built form to allow views through the development to the open landscape to the south;
- Individual driveway access onto The Ridge in keeping with the local pattern;
- A soft edge to the southern boundary of the site with tree planting;
- Retention of the hedgerow front boundary treatment;
- A density to reflect that of the adjoining houses on The Ridge

4. Flooding

Consultation comments:

- Additional strain put on recently installed flood prevention works
- The site is located towards the apex of the ridge and while not an obvious location for flooding does indeed impact on surrounding properties. Already properties to the north of the roadway are subject to excessive surface water run off from the direction of the proposed site, which invades both driveways and homes. The development of this site and subsequent impact on natural soakways will only exacerbate the situation.
- It has been known for flooding to occur even on the Ridge after heavy rainfall. Further building will exacerbate this problem for existing houses especially on the northern side.
- The land slopes and there is a drainage issue to the eastern side; Lawrence's Lane is at present wet after weeks of little rainfall.
- The site also has significant implications for flooding. At present, surface water from The Ridge runs off into adjacent property, and in times of heavy rainfall this has caused flooding in properties on The Ridge; something that occurred again in the heavy rains earlier this year. New houses would add to an increase in surface water flow, and exacerbate the flooding effect. Water draining from the back of the houses would flow onto Lawrences Lane, which is already frequently flooded, and down into the lower parts of Cold Ash.

Council response:

Comments noted.

The concerns the community have regarding potential flooding issues in Cold Ash are recognised. Although there is no evidence of flooding on this site, a Flood Risk Assessment (FRA) in accordance with Core Strategy policy CS16 would be required for any of the sites proposed for allocation in Cold Ash. This would need to clearly show how the development would not impact on flood flows. Appropriate flood mitigation measures, including Sustainable Drainage Methods (SuDS) would also be required.

5. Highways and road safety

Consultation comments:

- Traffic coming into the village from the east end of the Ridge is already heavy and exasperated by roadside parking around St.Finians school. It should also be noted there is no footpath along this part of the Ridge.
- Road safety concerns for both road users and pedestrians from any additional increase in the volume of traffic. Roads through the village are already very busy, especially around the school and post office
- The site is situated on a stretch of narrow road with neither pavements nor street lighting. The road, while narrow, is used as a rat run between the local towns/villages and the M4/Reading at all times of day, often with excessive

speeds. To add additional access to this stretch of road will exacerbate the situation.

- This is a narrow road and can get very busy near the proposed development, especially with school drop-offs at St Finians school where the road is reduced to one lane when parents park. Adding more housing with cars joining the road will cause more disruption.
- Congestion occurs on a daily basis along The Ridge in connection with parents picking-up children from St Finian's Primary School. Cars are regularly parked along the frontage of the proposed site. Development of the site will further exacerbate this problem.
- Current 2 hourly bus service is inadequate to encourage non car based travel
- A community led peak period mini bus service has been encouraged but not taken up
- Any development in Cold Ash should be used as an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Council response:

Comments noted.

The particular characteristics and limitations of the road layout within the parish are recognised. However, the traffic generated from this level of development is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. Considering the shape of the site, multiple private driveways will be provided.

It is recognised that there are no footways within the vicinity of the site but footway provision will be sought to link the site to footways and bus stops nearby fronting St Finians School. Bus services to and from Cold Ash are limited but development could provide an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

Traffic outside schools is recognised to be an issue across the district. The Council works with schools to develop and deliver travel plans to encourage and support pupils to walk and cycle to school.

6. Impact on wildlife

Consultation comments:

- The field contains a rich and diverse set of animal life including deer, red kites, owls, woodpeckers, hedgehogs, pheasants, moles, voles, mice and raft of other mammals and birds.
- The mature hedgerow that forms frontage to the site along its boundary with The Ridge is home to a large number of birds and mammals and is an important food

source for animals in the winter. Such hedgerows are becoming increasingly scarce in the parish and development of the plot will require that the greater part of the hedge be removed.

Council response:

Comments noted.

The Landscape Capacity Assessment (2015) for COL006 indicates that development on the site would be considered acceptable subject to the retention of the hedgerow front boundary treatment.

An extended phase 1 habitat survey would be required as part of any planning application, together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected

7. Infrastructure

Consultation comments:

- Services supporting the community – doctors, schools etc are already at capacity and struggling to support the size of the community already in situ.
- Concern that the schools will not be able to accommodate additional pupils
- The site lies some 1000m from the villages two public houses, 1200m from the village shop and some 1300m to the Acland Playing Fields and St Marks Primary School. Buses to the majority of the areas secondary schools, including the catchment Trinity School, only pick-up from the centre of Cold Ash, a 1200-1300m walk from the proposed new houses. The lack of pavements to facilitate safe or practicable access to these community services demonstrates that the proposed houses on The Ridge will be almost completely dependent on private motor vehicle, increasing car journeys in the parish. As such, the fringe position of this site does not meet basic rural sustainability objectives outlined within Area Delivery Plan Policy 1 of the adopted Core Strategy.
- Recommend that we liaise with Thames Water to ensure that the impact of new development and any upgrades that may be required to the sewer network are understood, either through the production of a drainage strategy or the provision of a connection to the sewerage system at the nearest point of adequate capacity
- The eastern end of Cold Ash is poorly served by broadband. The addition of additional houses at St Finian's Convent and at St Gabriel's Farm will further degrade the broadband service with limited prospect of improved cabling in the foreseeable future. Many of the residents work from home and rely on an already inadequate broadband service.
- Infrastructure and services have to be developed to support any increase in community size. The ability to do this and the funding provision has to be communicated in parallel with any increase in housing proposals.

Council response:

Comments noted.

Existing pressure on some local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

8. Loss of rural character

Consultation comments:

- Building on the St Gabriel's Farm site would contravene NPPF guidelines that clearly state that highly visible areas, such as exposed ridges, landforms and open slopes, should be protected. The site is positioned on an open, south facing slope of The Ridge where trees are not available to screen and break-up the visual impact of the proposed new housing. Open vistas across the Kennet Valley are afforded from the site, and these views would be lost forever. Views towards The Ridge from the south and from the well-used public footpath immediately to the southwest (COLD23/1) would also be detrimentally impacted.
- The NPPF guidelines also state that areas of sporadic, dispersed or ribbon development should normally be excluded from development. The St Gabriel's Farm site currently contributes greatly to the setting of the village approach from the east and the transition from agricultural land and wooded lanes into the village proper. Indeed, it is part of the patchwork of green space that contributes to this very specific character of The Ridge. Development of these open spaces will erode the appeal and character of the village.
- Review of the evidence-based documents of the Strategic Housing Land Availability Assessment (SHLAA) and the Sustainability Appraisal (SA), indicates

that two comparable sites along The Ridge, COL009 and COL010 were dropped from the HSADPD on grounds of landscape impact. However, it is not clear why these sites have greater landscape value than St Gabriel's Farm and it would appear that the policy guidelines have been inconsistently applied to the detriment of COL006.

- The proposed site, bordering the AONB, currently provides a natural corridor between the farmland to the south and the AONB to the north - presenting one of the few spots within the village whereby open views across both areas can be found. Closing of this corridor would substantially detract from the village approach and setting.
- Allocation of this green field site for housing would materially impact and harm the landscape character of the village and adjoining setting of the North Wessex Downs AONB. Arguably, the landscape impact would be most dramatic on this southerly open flank of The Ridge where trees are not available to screen and break-up the visual impact of the proposed new housing. The impact of the new build houses would be most pronounced in the public views when approaching via the well-used public footpath running diagonally from Lawrences Lane to The Ridge to the south of the site (COLD23/1). This iconic view is one of the images portrayed on the Parish website and clearly has significant value to the local community.
- This development would degrade the rural approach into Cold Ash from the East, and any development would be likely to be based on similar house designs which would be totally out of character with the rest of The Ridge, which has a very varied mix of house and bungalow styles.
- The proposed development is right at the edge of the North Wessex Downs AONB and the views from the AONB over the site extend across open country to the hills of Greenham Common in the distance. These views would be lost if houses were developed on the site. The edge of the site adjacent to the road is marked by an ancient hedge, providing homes for wildlife. This hedge would be destroyed by any housing development.
- The open vista that the plot currently affords contributes greatly to the setting of the village approach and the site lies at the transition between the more open and rolling topography of the Kennet Valley to the south and the wooded hillsides of the AONB to the north.
- Development of the St Gabriel's Farm site will result in significant degradation of the landscape and it can be argued that all three sites along The Ridge have similar landscape value. The COL009 site was also discounted due to the lack of footpaths along The Ridge, a feature where there is once again synergy with the St Gabriel's Farm site. As such, policy guidelines appear to have been applied inconsistently and to the detriment of COL006.
- The Ridge is an important leisure amenity for the wider community with a large number of walkers, runners, cyclists and horse riders using Lawrences Lane, The Ridge and the footpath to the south of the field as circular routes.
- A well used public footpath (COLD23/1) runs diagonally immediately to the south of the site between Lawrences Lane and The Ridge. This footpath connects with various public footpaths and bridleways running both to the south into Thatcham (Thatcham Path 6) and to the north into Westrop, Bucklebury Common and the Pang Valley. The area is thus an important leisure amenity.
- Visual impact on the footpath that runs from Lawrence Lane to the back of the Convent (St.Finians) and/ or approach to village. The view up to The Ridge

across the proposed site is particularly special and I cannot believe that the building of a small number of houses can be balanced against the loss of this stunning landscape feature.

Council response:

Comments noted.

Cold Ash sits on the southern edge of the North Wessex Downs AONB, with much of the village just outside the boundary and only the houses to the north and east of The Ridge within the boundary. Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB.

The LCA (2015) for COL006 indicates that development on the site would be considered acceptable without harm to the setting of the AONB provided an opportunity to retain views southwards towards the Kennet valley is included within the development layout and the rural character of this approach to Cold Ash is conserved and enhanced.

A linear development reflecting the existing built form is considered acceptable subject to the provision of:

- A gap in the built form to allow views through the development to the open landscape to the south;
- Individual driveway access onto The Ridge in keeping with the local pattern;
- A soft edge to the southern boundary of the site with tree planting;
- Retention of the hedgerow front boundary treatment;
- A density to reflect that of the adjoining houses on The Ridge

9. Comments from the site promoter

- The site is available now and deliverable within a 5 year period, subject to obtaining planning permission, and will positively contribute to the district's 5 year housing land supply. There are no other known constraints that may prevent development on the site. It is well related to the existing settlement of Cold Ash and would constitute sustainable development in accordance with the National Planning Policy Framework.

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

COL011: Land at Cold Ash Hill

Responses received: 19

1. Principle of development

Consultation comments:

- Concern about the principle of additional development in the village and that any future developments would have an adverse impact on the overall quality of village life
- Concern about the principle of developing on greenfield sites
- Concern over lack of affordable housing in the village

Council response:

Comments noted.

The adopted West Berkshire Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The role of the strategy is to achieve an appropriate balance between protection of the District's environmental assets and improving the quality of life for all, ensuring that necessary change and development is sustainable in the interests of future generations. Not all development can be accommodated within the District's urban areas, and this would not be the best approach to meeting housing needs across West Berkshire as a whole. However, urban development will be maximised.

The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The spatial strategy builds on the existing settlement pattern, with a particular focus on Newbury as the District's administrative centre and on other sustainable urban areas. The aim is to maintain a network of sustainable communities, meeting the needs of communities while protecting and enhancing the environmental assets of the District. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Cold Ash as a service village within the Settlement Hierarchy. This means that Cold Ash, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Cold Ash will accommodate some additional housing growth to 2026.

It is acknowledged that the District is an area of high property prices compared to levels of income. Methods for securing affordable housing and as an element of market housing have been well established and provision will be sought in accordance with Core Strategy policy CS6.

2. Consultation process

Consultation comments:

- Concern that the Parish Council was not given an opportunity to comment on this proposal.
- Additional information submitted by the Parish Council on 7 March 2014 was not included in the published consultation documents.
- Concern that evidence in SA/SEA is erroneous and incomplete regarding flooding, traffic and local services. Additional information has been supplied by the Parish Council.

Council response:

Comments noted.

This site was not submitted to the Council until after the workshops the Council had with parish councils in February 2014 had taken place.

The submission made by the Parish Council on 7 March has been checked and it can be confirmed that the information contained in Annexes B C and D was included in the Consultation Statement. Annex A was omitted though and we apologise for this. Appendix 2 of the Consultation Statement submitted to the Secretary of State will therefore be updated to include this. Assurances can be given that the information contained in Annex A was taken into consideration as part of the site selection process. (An update also needs to be made to the Thatcham (Cold Ash) 5 February 2014 notes).

The additional information and the revised site assessment forms submitted by the Parish Council for the various sites within the parish of Cold Ash have all been taken into account in revising the site assessments and SA where appropriate at this stage.

3. Flooding

Consultation comments:

- Concern about flooding and surface water run off as the site forms a natural buffer for run off from Cold Ash Hill.
- Concern about the high risk of flooding from Cold Ash stream which cannot be mitigated for
- Concern about flooding from the culvert to the north of the site which carries the Cold Ash stream and which was one of the main sources of the flooding in 2007. Also concerned about surface water run off as the site forms a natural buffer for run off from Cold Ash Hill.
- Additional strain will be put on recently installed flood prevention works

Council response:

Comments noted.

The site falls within an area at risk from surface water flooding. A Flood Risk Assessment would be required and appropriate flood mitigation measures, in accordance with Core Strategy policy CS16, would need to be put in place as part of any proposed development scheme. Details of this would come forward as part of a planning application.

4. Highways and road safety

Consultation comments:

- Concern about road safety due to inadequate sight lines on Cold Ash Hill
- Concern about road safety along Cold Ash Hill due to speeding traffic.
- Concern about road safety for pedestrians due to the lack of pavements
- Concern about road safety, particularly for cyclists, due to the increase in volume of traffic.
- Concerns for both road users and pedestrians from any additional increase in the volume of traffic. Roads through the village are already very busy, especially around the school and post office
- Current 2 hourly bus service is inadequate to encourage non car based travel
- A community led peak period mini bus service has been encouraged but not taken up
- Any development in Cold Ash should be used as an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Council response:

Comments noted.

The particular characteristics and limitations of the road layout within the parish are recognised. However, the traffic generated from the level of development proposed for Cold Ash is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

5. Infrastructure

Consultation comments:

- Inadequate infrastructure
- Recommend that we liaise with Thames Water to ensure that the impact of new development and any upgrades that may be required to the sewer network are understood, either through the production of a drainage strategy or the provision of a connection to the sewerage system at the nearest point of adequate capacity
- Concern about impact on local infrastructure, particularly drainage
- Impact on village services, especially the school
- Concern that the schools will not be able to accommodate additional pupils
- Consideration should be given to external lighting

- Requests details of a S106 agreement

Council response:

Existing pressure on local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

On the information available to date Thames Water do not envisage infrastructure concerns regarding Water Supply, or Waste Water capability in relation to this site.

6. Loss of rural character

Consultation comments:

- The site forms part of the maintenance of the separate identity of Cold Ash from Thatcham.
- Concern that Cold Ash would lose its separate identity and merge with Thatcham
- Adverse impact from linear development on the southern gateway into Cold Ash
- Adverse impact on the rural character of the area
- Concern that development on part of the field would set a precedent so that development on the remainder would be hard to resist.
- Impact on rural views from Hatchgate Close
- Impact on wildlife

Council response:

Cold Ash sits on the southern edge of the North Wessex Downs AONB, with much of the village just outside the boundary and only the houses to the north and east of

The Ridge within the boundary. Conserving and enhancing the distinctive landscape character of the AONB is given considerable weight when assessing sites for development. The Council has therefore ensured that sites within or within the setting of the AONB have been subject to a Landscape Sensitivity/Capacity Assessment (LSA/LCA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether a site could be developed without causing harm to the natural beauty and special qualities of the AONB.

The LSA (2015) noted that this site had poor landscape and visual connections with the main built form of the settlement and that development here could potentially erode the separate identities of Cold Ash and Thatcham. It therefore concluded that it should not be pursued further as a potential housing site.

7. Comments from the site promoter

Supportive of both COL006 and COL011. Confirmation that site is available and deliverable

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Cold Ash Rejected Sites

COL004: Liss, Cold Ash Hill

Responses received: 1

Comments from the site promoter:

- COL004 should be included within the settlement boundary
- Agrees 27 dwellings would create too dense a development but thinks an additional dwelling would be acceptable

Council response:

Following the Preferred options consultation the settlement boundary for Cold Ash has been reviewed in accordance with the finalised settlement boundary review criteria. It is not considered that COL004 meets the criteria for review and so no amendments have been made to the boundary in this area. While the site is adjacent to the current settlement boundary it is not considered that additional development over the site would relate well to the existing settlement pattern in this area.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - East Kennet Valley Spatial Area

Burghfield Common General Comments

Responses received: 14

- The plan has been positively prepared, and gives reasonable conclusions

1. Principle of Development

Consultation comments:

- Within AWE outer consultation zones, but not within the current detailed emergency planning zones. Office for Nuclear Regulation (ONR) would not advise against the inclusion of the sites at this time
- Support the Core Strategy process, in particular consultation with Parish Councils at an early stage
- Support the choice of BUR002, 002A, 4 and BUR015
- The number of dwellings proposed is appropriate for the size and location of Burghfield
- A mix of tenures would be in line with national housing strategy and local demographic need.
- Inclusion of sheltered housing would reduce traffic levels
- Burghfield Common has not been a village for years
- The village has been subjected to several major developments in recent years
- Advice from the Lib Dems has not been heeded regarding focusing development on Brownfield land to avoid further major development in villages such as Burghfield Common
- Urge the council adheres to the Core Strategy and does not provide more development on the East Kennet Valley than set out in the document.
- BUR002, 002A, 004 is marginally less objectionable than BUR015 and would be less visually obtrusive and would not result in the loss of agricultural land
- Support the allocation of sites to the north end of Burghfield
- Would only like to see one site in Burghfield

Council response:

Comments from AWE are noted. Consultation will take place with ONR at planning application stage for those sites which have been allocated.

Support for the process and proposed allocated sites noted.

All new residential development has to include a proportion of affordable housing in accordance with adopted policy. On Greenfield sites this is 40%, in a mix of social rented and intermediate affordable units.

Where the Council are aware of suitable brownfield land this has been taken into account when calculating the remaining housing requirement. The Core Strategy is

clear that allocations will be required on Greenfield sites, in the settlement hierarchy, to meet the Core Strategy housing requirement. It is recognised that the allocation of Greenfield sites may result in the loss of agricultural land. The Core Strategy sets out minimum requirements for each spatial area, and aims to deliver the total housing requirement within the spatial strategy.

Alternative sites

Consultation comments:

- Support the rejection of BUR006, 007 and 011. They would extend the building line, are not well related to the village and would create access issues on Hollybush Lane
- Loss of Greenfield land, should use brownfield sites near Theale where transport links are better
- Both preferred options sites would be preferable to Firlands – further development along Hollybush Lane is not sustainable

Council response:

Support for the rejection of BUR006, 007 and 011 is noted.

The allocation of sites is proposed in accordance with the spatial strategy of the Core Strategy. The Core Strategy was found sound at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the East Kennet Valley would be able to take the amount of development proposed. Theale will have its own sites allocated as part of the Eastern Area.

2. Flooding

Consultation comments:

- Flood risk – more trees are needed not houses

Council response:

None of the proposed sites are within flood risk areas (either fluvial or surface/groundwater). Flood Risk Assessment would be required to accompany any planning application, and would need to consider all sources of flooding and set out mitigation measures including Sustainable Drainage Systems (SUDs) for dealing with any water generated on the site.

3. Highways and transport

Consultation comments:

- Opposition to any development that is likely to increase traffic on Hollybush Lane
- Increased traffic
- Setting back from the main road gives potential for sites roads and cycle paths to be built without the need to use Reading Road – improving Road Safety

Council response:

Comments regarding traffic on Hollybush Lane are noted. Transport Assessment work carried out for two recent planning applications/appeals has been taken as a proxy for the potential impact from development of the allocated sites. The Assessment indicates that development of the scale proposed for Burghfield Common would not have a significantly negative impact on the highway network.

Improvements to walking/cycling networks would be considered at planning application stage.

4. Infrastructure

Consultation comments:

- Older residents are more likely to use local facilities and amenities
- More amenities and shops are needed, and development will support this
- House building should be accompanied by new facilities
- Lack of school places, doctors, dentists etc.
- Pressure on utilities and overstretched refuse collections, especially sewage system
- Provision of new housing will support viability of shops and services

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

BUR002/002A/004: Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common

Responses received: 554

Template responses received: 503 (91%). 3 individual templates were received, 2 objecting to development on the site, and one supporting development of the site:

- BUR002 002A 004 Template (1) - objection
- BUR002 002A 004 Template (2) - support
- BUR002 002A 004 Template (3) – objection

1. General

Consultation comments:

- The DPD omits the proposed development at Mans Hill – the traffic impact of both developments should be taken into account
- Support for allocation
- Object to allocation
- Both preferred options are better than Firlands
- Preference for this site, as it is screened and a wasted area that most people do not know is there
- Loss of semi-rural character
- Only one site should be allocated in Burghfield
- Social housing and traveller sites are well catered for in the Burghfield Common area
- This location should have the least impact on services/facilities
- This village is already at bursting point and cannot withstand further development
- Opposition from parish council (*comment not made by PC*)
- Need for a clear policy to prevent speculative planning applications
- Better to allocate sites than have planning by appeal
- Some of the housing types proposed could have a serious detrimental effect on property prices in the village
- BUR004 has not been subject to the same scrutiny as other sites in the SHLAA. There is a lack of robust analysis relating to the impact in the SA/SEA – more investment would be required here than the other sites – further from schools, shops
- Pleased to see neither Firlands nor Mans Hill have been put forward

Council response:

The DPD process and the process for considering a planning application are two different processes. The DPD looks strategically at all sites submitted to the council and allocates the most suitable for development. The Development Control process considers each planning application against the current planning policies and other material considerations. Mans Hill was not included within the Council's preferred Options DPD, and the planning application was refused and the appeal was

dismissed. There are no plans to reconsider Mans Hill as part of the DPD process; the site is significantly larger than required within the spatial strategy for the East Kennet Valley and Burghfield. The aim of the DPD is to allocate sites to meet the at least 10,500 housing figure of the Core Strategy, providing a degree of flexibility to ensure that the Council can maintain their five year housing land supply.

It is noted that there is both local support and objection to the inclusion of this site, and that overall the preferred options sites are preferred to either Mans Hill or Firlands, both of which have been subject to refused planning applications. Firlands has been granted planning permission on appeal for up to 90 dwellings, although the Council is challenging this decision. The Parish Council have stated as part of the preferred options consultation that they would prefer development on this site.

The preference for the allocation of only one site within Burghfield Common is noted.

Adopted Core Strategy policy CS6 sets out that all new development on Greenfield sites is required to deliver 40% affordable housing (30% on brownfield land), with a combination of social rented and intermediate affordable units. There is a need for additional affordable housing in West Berkshire and all new development is expected to contribute towards meeting this need. The Council have a duty to provide sites for Gypsy and Travellers, these can only be provided on sites put forward for consideration for this purpose.

The impact on property prices is not a planning issue and therefore, cannot be taken into consideration.

All sites have been subject to site assessment and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). These have been carried out on a consistent basis across all sites submitted to the Council for inclusion in the SHLAA.

Comments about the rejection of Mans Hill and Firlands noted.

2. Principle of Development

Consultation comments:

- The site is away from the main part of the village and will not impinge on the approaches in any way
- The character of the area will be preserved
- Parish Council would prefer development on this site
 - Would be visually less obtrusive
 - Is not in active agricultural use – the PC do not support the loss of active agricultural land as at BUR015
 - Smaller development would have less of an impact on the village
- The site is as far away from the village centre (taken as the village hall) as its possible to be
- Significant impact on the character of the area

Council response:

Support for development on this site is noted.

The SA/SEA has not raised any concerns regarding the impact on the character of the area as a result of development on these sites. Sensitive design will be important to respect and enhance the character and appearance of the area.

The only sites that are closer to the village hall are those located along Hollybush Lane, such as BUR007 (Firlands), which is not being considered for allocation partly due to the strength of local feeling against the site. The village hall is less than 1.5km from the site.

Alternative sites

Consultation comments:

- The overall impact on the character of the area would be less if BUR006 or 007 were developed – concerns relating to BUR007 over spilling could easily be contained by planning condition
- Existing council properties should be redeveloped to give a greater density and therefore, higher number of dwellings
- Preference for other site (BUR015) due to lesser traffic impact

Council response

BUR006 and 007 were not included as preferred options and other sites were considered more suitable for development. Part of BUR007 has been granted planning permission on appeal, although the Council are challenging this decision. The site promoters for BUR007 have made it clear as part of the Preferred Options consultation that they would like to see development of up to 300 dwellings across the whole site over time.

The Council do not own any affordable housing stock but work with Housing Associations, therefore, the Council themselves are unable to redevelop areas of affordable housing, this would need to be done by the Housing Associations themselves. Many areas of poor quality affordable housing have been redeveloped in recent years.

Preference for allocation of BUR015 noted.

Deliverability

Consultation comments:

- The site is in multiple ownership which would impact on deliverability
- BUR002A/004 are only viable options if BUR002 is brought forward
- BUR016 is closely related to the existing settlement boundary and can be accessed via a private driveway, therefore could be developed without the benefit of the other sites in the group
- Delivery of 85 houses on this site is questionable

- Part of the site falls outside the land registered under title BK324735, it appear to be unregistered – this impacts on the deliverability of the site as the owner is unknown
- If BUR002/2A are allocated BUR004 should be removed from the allocation – this would reduce the impact on Lamden Way and allow a small area of green space as a buffer between the existing and new development
- Not all landowners were aware their land was included in this site
- There are a number of restrictions on the site (BUR004)

Council comments:

Deliverability of a site is critical to its allocation. It is recognised that the site is in multiple ownership, however, the landowners are understood to be committed to developing a single master plan for the whole site and this can also be sought through any planning policy that is prepared to guide the future development of the site. Part of the site has been removed, on the request of the landowner, and is being considered as a separate site (BUR019) for inclusion within the settlement boundary.

It is acknowledged that BUR002, and potentially BUR004 require access through BUR002A, and are therefore, only deliverable in conjunction with BUR002A.

BUR016 was withdrawn from the SHLAA prior to the preferred options consultation and therefore, is not being considered as part of the site.

Housing numbers

Consultation comments:

- Burghfield has already received a significant amount of growth
- The village does not need 200 new homes to remain viable or improved
- Housing figure is imposed from remote bodies on the local community
- Housing numbers should not be more than those referred to in the DPD
- There is not a housing shortage in this area
- Mortimer has more facilities, the same bus service and a station – therefore, should receive more development

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The council is required to meet this requirement through what is known as a five year housing land supply. Without a five year housing land supply the Council can be vulnerable to planning by appeal, which could result in unsuitable developments coming forward. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the East Kennet Valley. Each spatial area has its own housing requirement to be delivered. The core strategy was rigorously tested at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the East Kennet Valley would be able to take the amount of development proposed.

Within the East Kennet Valley there are two Rural Service Centres (Burghfield Common and Mortimer) and two Service Villages (Woolhampton and Aldermaston). The housing requirement for the area is split between these areas, with the rural service centres receiving more development than the service villages as a result of the better level of service and facilities available. The settlements within the East Kennet Valley are to receive less development than similar level settlements elsewhere in the district to reflect the more limited and poorer transport connections. Aldermaston is not set to receive any development due to its proximity to AWE.

Land uses

Consultation comments:

- Should be using brownfield/underused industrial areas around Newbury
- Use of brownfield sites (such as the former Springwood Engineering site in Bunces Lane)
- Loss of a Greenfield site

Council response:

Where the Council is aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Planning history

Consultation comments:

- Previous appeal on the site (2011) was rejected – ‘lacking permeability and convenience, no direct link to the village without using the narrow, busy Reading Road’ – the site cannot be described as sustainable
- Previous planning permission for BUR002/2A has been rejected at appeal, therefore, the site should have been rejected as having potential for development

Council response:

The previous application was submitted as a speculative planning application, which in principle was contrary to planning policy. Therefore, the Council had an in principle objection to the site. The site is now being considered through the plan led system, and therefore, if the site was to be allocated for development the principle of development on the site would be established as acceptable.

3. Coalescence of settlements

Consultation comments:

- Loss of separation between Burghfield Common and Trash Green and Burghfield Village
- Loss of village identity
- A green belt should be identified between Burghfield Village and Burghfield Common

Council response:

A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside and this approach is taken forward in policy CS19.

There are no designated green belts in West Berkshire.

4. Consultation process

Consultation comments:

- Lack of proper consultation
- Carried out during school holidays
- The new proposals have not had the same scrutiny as previous planning applications (Firlands/Mans Hill)

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection. A second formal period of consultation will take place from November to December 2015.

Mans Hill and Firlands were speculative planning applications, and were not being considered through the plan led system. The plan led system allows for several phases of consultation with the local community. The Preferred Options consultation allowed members of the public early consultation in to where they would like to see development in the future, rather than development coming forward piecemeal through speculative planning applications. There will be further public consultation on the proposed submission plan, and then members of the public will also be able to comment on the details of any planning applications coming forward in the future.

5. Density:

Consultation comments:

- Density is not appropriate based on the surrounding area
- The high density town based designs developers like building are totally out of keeping in a village environment
- Lamden Way consists of large properties at medium density

Council response:

The densities given in the DPD are indicative and the final density for any development would be subject to negotiation between the Council and the site promoter. 30dph is considered to be medium density development.

Densities in Burghfield Common range from approx. 23dph at Valley Road, to approx. 39dph at Acorn Gardens and approx. 30dph at Lamden Way (and the roads off it). Development of this site at 30dph would be in keeping with the existing densities within Burghfield Common.

6. Ecology

Consultation comments:

- Loss of wildlife habitats (badgers, bats, owls)
- Need for highway improvements will result in the loss of trees/hedgerows
- Environmental and Ecological survey reports must be given the highest priority to prevent urban sprawl
- Need to protect ancient woodlands, hedgerows and meadows
- Woodland on the site reduces the developable area of the site, which could reduce housing numbers on the site to as little as 35.
- Impact on ancient woodland from more people and more cars
- Proximity to Pondhouse Copse – GI should be incorporated and a buffer zone provided – further discussions should take place at planning application stage with Natural England

Council response:

The Council's ecologist has been consulted on all sites considered for allocation. It is recognised that BUR002 is partly within a woodland BAP habitat and that there is a badger set on the site. An extended phase 1 habitat survey would be required, specifically considering badgers, reptiles and bats. Appropriate buffers would be required around the ancient woodland. The site promoters have confirmed that they do not intend to develop the area covered by woodland.

7. Emergency planning

Consultation comments:

- Site is in the middle AWE consultation zone
- One site already rejected for being too close to AWE, but this site is not much further away

Council response:

ONR have been consulted on all the sites within the Preferred Options DPD and have not raised any concerns regarding the level of development proposed in the DPD. Development in the AWE consultation zones will require specific consultation with ONR in line with policy CS8 of the Core Strategy.

8. Flood Risk

Consultation comments:

- Potential surface water issues to the northeast of the site which could impact on the location of housing
- Winter 2013/14 floods mean that many people had difficulties getting out of the Burghfield area
- No surface water drainage, water often sits on the site
- Development of the site would result in higher flood risk to neighbouring properties
- The site suffers from localised flooding

Council response:

The site is not within any designated flood areas (fluvial or surface/groundwater). A flood risk assessment would be required to accompany any planning application for the site. This would need to consider all sources of flooding and set out mitigation measures for water generated on the site. Sustainable drainage systems (SUDs) would be required on the site.

There were no reported incidents of properties flooding during the Jan/Feb 2014 floods, although it is acknowledged that a number of local roads were flooded.

9. Highways and transport

Traffic and congestion

Consultation comments:

- Congestion/traffic on Clayhill Road, Lamden Way, Hawksworth Road and Reading Road, Burghfield Road
- The local road system is not designed for more traffic, regular traffic jams occur at traffic lights leading to rat running

- Journeys to Reading/Theale will take longer as there will be delays getting out of the village
- Traffic is now using Burghfield as a cut through instead of the A4
- Reliance on private car travel
- Traffic impact cannot be fully assessed without a specific scheme to consider

Council response:

Transport assessment work carried out by the Council in relation to the Mans Hill and Firlands appeal sites have shown that if both the appeal sites were to be developed the highway network would still operate within capacity. This work has been used as a proxy to show that development of either of the preferred options sites would not lead to issues of capacity on the highway network as the numbers involved are less than the two appeal sites. Transport Assessment work carried out for West Berkshire as a whole (although not specifically covering this area) does not show a significant impact on the highway network as a result of development of the Preferred Options HSA sites.

Transport Assessments/Statements would be required to accompany any planning application received and would need to consider the very local impact of the development. A Travel Plan would also be required, which would look at ways to encourage residents to walk and cycle, and consider alternative modes of travel to the car, especially for local journeys.

Access

Consultation comments:

- Access to Reading Road and Burghfield hill is difficult now
- Access should be from Clayhill Road, it has better visibility, good pavements and appears safer all round
- BUR004 currently only accessible via Lamden Way, which is a private road

Council response:

Specific details relating to access on to Reading Road would be considered at the planning application stage as part of the Transport Assessment/Statement work which accompanies a planning application.

Access to this site could not be achieved onto Clayhill Road.

It is noted that Lamden Way is a private road. Access to BUR004 could be achieved through BUR002A/002.

Parking

Consultation comments:

- Local shops do not have adequate parking

Council response:

Concern regarding parking at local shops is noted.

Public transport

Consultation comments:

- Poor and decreasing bus services
- Mortimer railway station is the closest station, but has limited parking

Council response:

Consultation has taken place with the Council's Public Transport Service; they have not raised any concerns regarding development and levels of bus services within Mortimer. The Lime 2/2a service provides a 1/2 hourly service between Burghfield Common and Reading Station on weekdays and Saturdays, with an hourly service on a Sunday. There is also a weekly shopper service to Newbury town centre on a Tuesday and Thursday morning.

It is acknowledged that there is limited parking at Mortimer railway station. The Neighbourhood development is considering the options for improving parking provision.

Road safety

Consultation comments:

- A number of accidents and near misses have occurred towards the bottom of the hill while waiting to turn right into James Lane
- There have been a number of road safety incidents on Reading Road

Council response:

Road safety issues will be picked up through the site Transport Assessment/Statement that will accompany a planning application.

Walking and cycling

Consultation comments:

- Walking children in the village is unsafe now
- No footpath along part of the road for children walking to school – no room to add one either
- Narrow pavements through the village
- Recent request for pedestrian crossing has been declined
- Need proposals for pedestrians and traffic calming

Council response:

The provision of a new footway in front of the site would form part of the discussions at planning application stage. A footpath would be required to be provided to join the site into the existing road network. This will form part of the negotiations between the Council and the site promoters.

A new pedestrian crossing could be provided as part of the new development.

It is noted that there are narrow pavements throughout the village. Improvements to the pavement network could be sought as part of the development of the site.

Details of improvements for pedestrians will be set out in a Transport Assessment/Statement to accompany any planning application on the site.

10. Historic environment

Consultation comments:

- Proximity to Highwoods, which is designated as a property 2 site (Berkshire Gardens Trust). Development could affect the significance of the setting of the heritage asset. Concern in principle to development of the site

Council response:

While there is no formal heritage designation on Highwoods, any impact would be considered as part of any planning application on the site.

11. Infrastructure

Consultation comments:

- Local services/facilities are under enormous strain
- Closest children's play area is at the Hatch, which involves crossing Reading Road twice (both on blind bends)
- Would require significant financial developer contributions to ensure issues are resolved

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to

serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

All new development is required to provide Green Infrastructure in line with Policy CS18 of the Core Strategy; this can include the provision of children's play equipment. Any GI provided would be available for public use, not just use of new residents bringing a benefit to the whole community.

Education

Consultation comments:

- Schools are at capacity
- Where will children go to school
- Access to school would be possible without crossing Reading Road
- Local children are not getting into the local school
- Need for new schools, play areas and support services – no mention of where these will be located

Council response:

Consultation with the Local Education Authority (LEA) has indicated that a satisfactory solution to school place provision can be achieved for the limited amount of proposed development within the village. A longer term feasibility study into education provision in Burghfield Common is to be undertaken due to the recognised pressure.

Medical facilities

Consultation comments:

- Doctors at capacity

Council response:

The need for additional medical facilities will be considered through the Infrastructure Delivery Plan.

Utilities

Consultation *comments*:

- Issues relating to sewage flooding – needs a solution from Thames Water before development takes place
- Low water pressure

Council response:

Consultation has taken place with Thames Water. They have raised concerns regarding water supply capability and waste water services and state that improvements to infrastructure are likely to be required. A water supply and drainage strategy would be required as part of any planning application should the site be allocated. This would be sought through a policy for the site.

12. Landscape/Setting

Consultation *comments*:

- Local villages need to retain their individual characters
- Site has not real use at the moment – not used for agriculture or residential purposes
- This site will have the least visual impact for the two preferred options
- The site is on a slope – development would only be possible on the southern edge nearest the current properties. Topography would not allow acceptable design
- Loss of green lung for village

Council response:

Sensitive design will be critical to the development, and would need to take into account the character of the surrounding area.

It is noted that the site is not in agricultural use.

The site is well screened from Reading Road, and additional planting and landscaping would be required to minimise the impact of development on the landscape. There is currently no public access to the site; development on the site would result in the provision of a degree of public open space, which could improve access to such areas for the local community.

It is noted that the site is on a slope. The site area proposed for allocation has taken the topography into account.

13. Personal

Consultation comments:

- Impact on residents at The Hollies Nursing home – increased stress levels – need peace and tranquillity
- No associated employment, meaning many people will have to commute

Council response:

Planning conditions can be used to limit working hours/times which can help to reduce noise levels and the impact on the local community.

There are a number of job opportunities in the local area, including AWE, however it is recognised that new residents will be likely to have similar commuting patterns to existing residents.

14. Pollution

Consultation comments:

- Noise
- Air quality
- Light pollution

Council response:

It is unlikely that development of the site will have a significant impact on pollution levels. All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution. It is unlikely that development of the site would have a significant impact on noise or air pollution levels.

15. Sustainability Appraisal/Strategic Environmental Assessment

Consultation comments:

- The SA/SEA was done behind closed doors and not by people with local knowledge
- Comments that the site is close to local services and facilities/close to amenity space and play areas/well related to existing settlement/presence of footways are clearly wrong

Council response:

The SA/SEA is carried out on a consistent basis across all sites being considered for allocation. The site is well related to the existing settlement, and is close to local service and facilities (nearest amenity space, pharmacy & medical centre approx. 600m, nearest shops approx. 400m). There are footways throughout Burghfield, and should development take place this would need to be extended to link the site into the exiting footway network. Additional green infrastructure (which could include a

play area) would be provided alongside any development as set out in policy CS18 of the Core Strategy.

16. Settlement boundary

Consultation comments:

- No opportunity to further expand the site

Council response:

This site is physically constrained; the settlement boundary would be redrawn around the developable area of the site. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development.

17. Comments from the site promoter

BUR002A

- This site has been promoted individually for approx. 35 dwellings
- The site is unconstrained and deliverable now
- Safe and suitable access can be gained from Reading Road
- Woodland to the rear of the site is excluded from the submission
- The site could deliver as a standalone site, or as an early phase of a wider allocation

Council response

Comments noted. The woodland is covered by a TPO, so it is good to see that it is excluded from the proposed developable area.

The Council would like to see the whole site developed as one and this will be sought through any policy for the site, therefore, access would need to be provided through this site into the remainder of BUR002/004.

BUR002

- Part of this site is in the same ownership as BUR002A, but not all.
- Collaboration is going on between landowners to enable a comprehensive masterplan to be achieved – 75 – 85 dwellings could be achieved on the site
- No known constraints preventing development
- The site would constitute sustainable development in accordance with the NPPF
- All three landowners have been in detailed discussions and are firm in their commitment to make the land available for development
- The site relates exceptionally well to the existing village structure with access to a wide range of services/facilities
- There will be no material visual or amenity impact
- Development can properly be regarded as rounding off the settlement area in this part of the village

- There will be virtually no inter-visibility between the development of approx 85 dwellings on the site and the surrounding area due to topography and existing development
- The site is used as rough grazing and could not and does not form part of any agricultural unit
- No identified constraints which might adversely impact on development
- Development would not create any precedent for additional development on adjoining land
- Aware of a number of objections being made against the site:
 - Development will not destroy the rural nature of the area – the site is surrounded by development on 2 sides and is not materially visible from outside. Burghfield Parish Council recommended the site to WBC as being appropriate for development. New development would be outside the settlement boundary, but the purpose of the exercise is to identify sites that can be included within a revised settlement boundary. It would not promote ribbon development, it would consolidate the existing ribbon development along Reading Road
 - No loss of agricultural land. The last time the site was in agricultural use was 1957.
 - Density of the site is not yet known and would be subject to discussions with the LPA.
 - Reading Road does not need a TA to know that additional traffic from the site would not exceed the design capacity of the road. Traffic issues relating to the site can be mitigated by design measures as part of planning permission. The previous inspector did not suggest the site was unsuitable due to the traffic impact, rather the objections were relating to walking/cycling links – the allocation of the whole site would like into Lamden Way providing a safe walking/cycling route through the site
 - There is no justification/evidence that the development would overload existing infrastructure. Upgrading of the sewer system, if required, would be required prior to, planning permission being granted
 - No justification/evidence that there would be significant loss of wildlife. Were not aware of the ancient woodland designation, but understand that this applies. There has been some woodland clearance in recent years which could change the designation. It is suggested that the Council's ecologist checks the credibility of the designation. Regardless there is no intention to develop within the wooded areas
 - There is a badger sett in the land off the site. Badgers have not been seen on the site, they are more likely to forage on the more open areas to the north/west of the sett. Ecological studies will be carried out to accompany a planning application
 - It is unlikely that the site is in a significant wildlife corridor

Council response:

Comments noted. The woodland on the site is now subject to a TPO, and part of the site is adjacent to ancient woodland and buffers would be required. It is good to see that the woodland areas are proposed to be excluded from the developable area of the site. This does reduce the development potential of the site to approximately 60 dwellings (approx. Density 30dph).

A Transport Assessment/Statement would be required to accompany the site, but TA work already carried out on behalf of the Council indicates that this level of development can be accommodated.

Thames Water has raised concerns regarding Water Supply and Wastewater capacity in relation to the site. A water supply and Drainage strategy would need to be produced to determine what improvements to the network would be required. Any improvements would need to be delivered ahead of the development.

The retention of the woodland and provision of open space on the site will help to retain any wildlife corridors that are present across the site. It is noted, following a recent site visit, that ecological assessments are underway for the site.

BUR019 – formally part of BUR002

- Request for part of the site to be removed and shows as a separate site with separate access
- Would be for 3-4 dwellings
- Built to high sustainability standards, with solar PV panels, solar thermal panels and rainwater harvesting
- The site is adjacent to the settlement boundary
- Concern over the density proposed for BUR002 is not deliverable due to topography, woodland, and is not in keeping with the surrounding area

Council response

Comments noted. The site has been removed from the larger site (BUR002) and given the SHLAA ID BUR019.

Comments regarding the larger site (BUR002/004) are noted. It is proposed that the wooded area of the site is retained. This does reduce the developable area slightly, giving a development potential of approximately 60 dwellings across the whole of BUR002/004.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

BUR015: Land at Pondhouse Farm, Burghfield Common

Responses received: 284

Template responses: 247 (87%) One template response was used:

- BUR015 template (1)

1. General

Consultation comments:

- Thought no development would take place on this site
- Burghfield has already seen substantial development
- The village is already under pressure and over stretched
- The area is under siege from development – it should be spread across the area
- Realise there is a need for more housing, only one site should go ahead, that one being this site
- Construction of the site would cause less disruption than others
- Other sites will have less of an impact
- While not as good as BUR002/002A/004 this site is the next best option
- Request removal of site from DPD
- Impact on tranquillity
- Loss of village character/community
- Assessment appears to be rigorous and logical
- The site is definitely not the spot for a Gypsy and Traveller site there is already one on Aldermaston Road
- The DPD has caused great concern and distress among residents
- Parish Council have not been pro-active in discussing the DPD with residents
- Would prefer development on land that is not in use as a working farm, even Mans Hill or Firlands
- Impact on house prices
- Other proposed sites (Firlands/Mans Hill) have received village wide attention through campaigns against actual development plans, residents around his site had no prior awareness of the Council's plans and are now at a disadvantage to block any future plans because no plans have been submitted by a developer – residents should have been consulted sooner

Council response:

The site was submitted to the Council for inclusion in the Strategic Housing Land Availability Assessment (SHLAA) in 2010. The SHLAA is a list of all sites that land owners have put forward to the Council for consideration for development.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The council is required to meet this requirement through what is known as a five year housing land supply. Without a five year housing land supply the Council can be vulnerable to planning by appeal, which could result in unsuitable

developments coming forward. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the East Kennet Valley. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the East Kennet Valley would be able to take the amount of development proposed. Development is focused around settlements within the Core Strategy's Settlement Hierarchy. These settlements were identified by a range of factors, including sustainability and number of services/facilities available. All sites submitted to the Council have been considered and the most suitable put forward for allocation. The site assessment details are included within the SA/SEA.

It is noted that there is both local support and objection to the inclusion of this site, and that overall the preferred options sites are preferred to either Mans Hill or Firlands, both of which have been subject to refused planning applications. Firlands has been granted planning permission on appeal for up to 90 dwellings, although the Council is challenging this decision.

The preference for the allocation on only one site within Burghfield Common is noted.

The site is not being proposed for a site for Gypsies and Travellers.

Mans Hill and Firlands were speculative planning applications, and were not being considered through the Plan led system. The plan led system allows for ongoing consultation with the local community. The Preferred Options consultation allowed members of the public early engagement as to where they would like to see development in the future, rather than development coming forward piecemeal through speculative planning applications. There will be further public consultation on the proposed submission plan, and then members of the public will also be able to comment on the details of any planning applications coming forward in the future. Workshops were held with Parish Councils as part of the site selection process. Parish Councils were encouraged to engage with members of their community to engage local opinion at a very early stage of plan making.

It is recognised that the site is currently farmed. However, the site promoter has confirmed that alternative land would be provided for the farm should the site be allocated for development.

The impact on property prices is not a planning issue and therefore, cannot be taken into consideration.

Neither Firlands nor Mans Hill have been included as preferred options within the Council's Housing Site Allocations DPD.

2. Principle of development

Consultation comments:

- Need for more 2 bed houses for younger and older people

- Preference for a mix of housing to defined 'older' people's housing
- Setting precedent for future development on the rest of the site – the whole site would be over development of the village
- Would extend housing in already residential area, unlikely to impact on the character of the area
- Planning application in for Mans Hill and Burghfield Sailing Club
- A builder already owns the land on the other side of Clayhill Road
- Development would flow from existing development rather than being crammed in behind existing development
- Development here would be difficult to integrate due to a lack of screening
- Agree in principle to provision of affordable housing but the site is too large and in the wrong place – is a mix of affordable and private housing best suited in an area comprising of large properties?
- The site appears to suffer the same issues as those rejected – why is it believed to be more suitable? Lack of well organised opposition group?
- The Parish Council support the allocation of half the site, however they would only like to 50 dwellings on the site. There is a preference for smaller sites (comment not made by PC)

Council response:

Development on any site will need to provide a range of dwellings types and sizes. The comment regarding the need for more 2 bed houses is noted.

Only the developable area of the site would be included within the settlement boundary, with the areas outside the new boundary being protected from development.

The DPD process and the process for considering a planning application are two different processes. The DPD aims to look strategically at all sites submitted to the council and allocate the most suitable for development. The Development Control process considers each planning application against the current planning policies and on other material considerations. Mans Hill was not included within the Council's preferred Options DPD, and the planning application was refused and the appeal was dismissed. There are no plans to reconsider Mans Hill as part of the DPD process; the site is significantly larger than required within the spatial strategy for the East Kennet Valley and Burghfield. The aim of the DPD is to allocate sites to meet the at least 10,500 housing figure of the Core Strategy, providing a degree of flexibility to ensure that the Council can maintain their five year housing land supply, and therefore, continue to successfully defend applications at appeal. A Screening opinion request has been submitted for Burghfield Sailing Club (14/00326/SCREEN) but not a formal planning application.

Land ownership is not taken into consideration when assessing sites for allocation.

Development would need to be in keeping with the character of the local area, and take into account the need for landscaping and buffers to limit the impact on the surrounding area. This would be set out in a policy for the site.

All Greenfield sites are required by adopted Core Strategy policy to provide 40% affordable housing, in a mix of social rented and intermediate affordable units. The affordable units should fit with the design and character of the new development.

All sites have been subject to site selection and Sustainability Appraisal/Strategic Environmental Assessment, and various levels of consultation. It is from this process that the most suitable sites are put forward for allocation. Local opposition is not taken into account in the site assessment process.

Comments have been received from the Parish Council regarding their preferences for site allocation in the village.

Land use

Consultation comments:

- Use of previously rejected brownfield sites
- There is an abundance of brownfield sites in West Berks and this should be considered before development on farm land
- Use of brownfield sites – closer to services/transport and more likely to have affordable prices
- Greenfield site, in active agricultural use

Council response:

Where the Council is aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. By definition Greenfield land includes agricultural land.

Other sites

Consultation comments:

- While development on Firlands would be unfortunate at least it is flat and would not dominate the village and is not a working farm
- There is a site at the end of Clayhill Road which seems ideal – remains of an orchard and has already been partly built on
- Build on the outskirts of Theale which has a splendid secondary and primary school, a range of shops and is within easy reach of a large supermarket and regular bus service
- Redevelopment of existing Council properties at higher density
- BUR002/002A/004 is not visible and would have very little impact on the amenity of the area – it does not form part of a viable agricultural unit

Council response:

Development on part of the Firlands site has been granted planning permission on appeal (the council are challenging the decision).

The Council are only able to consider sites put forward for consideration through the Strategic Housing Land Availability Assessment (SHLAA).

Sites are also proposed to be allocated in Theale. Allocations need to be in accordance with the spatial strategy of the Core Strategy, which sets out the allocation of sites within spatial areas. Theale is within the Eastern Area and Burghfield Common is within the East Kennet Valley.

The Council is a non stock holding authority, meaning that they do not own any affordable housing themselves but work with Housing Associations, therefore, the Council themselves are unable to redevelop areas of affordable housing, this would need to be done by the Housing Associations themselves. Many areas of poor quality affordable housing have been redeveloped in recent years.

Comments regarding development preferred on BUR002/002A/004 are noted.

3. Ecology

Consultation comments:

- Loss of wildlife (deer, Red Kites, Buzzards, bats, owls, badgers)
- Loss of trees and hedgerows
- Development and infrastructure improvements would result in the removal of trees/hedgerows
- Proximity to ancient woodland, orchards and protected trees
- Previous developments in the village have destroyed oak trees
- Adjacent to Local Wildlife Site
- Mitigation measures for the ancient woodland and LWS would need to be set out as part of any planning applications and could include provision and management of public open space, management of designated sites
- Need to protect Omers gully for natural drainage and habitat
- The site is an important wildlife route for animals
- Need to protect designated area for future generations – less environmentally sensitive sites should be used
- Appropriate Green Infrastructure and Corridors should be provided should the site be allocated

Council response:

The Council's ecologist has been consulted on all sites considered for allocation. No concern has been raised regarding the site itself, although Omer's gully needs to be protected.

It is noted that the site is adjacent to ancient woodland and a Local Wildlife Site. Appropriate buffers would need to be provided. There are no trees protected by TPOs on the site, although there are a number along the south western boundary of the site. The site promoter has indicated that these trees would be retained, with some additional planting along this boundary.

All sites have been subject to SE/SEA which has not indicated any significantly negative impacts on environmental sustainability.

A degree of public open space and SUDs will need to be provided on the site which will help to retain space for wildlife on the site.

4. Emergency planning

Consultation comments:

- The site is in the middle AWE zone

Council response:

ONR have been consulted on all the sites within the Preferred Options DPD and have not raised any concerns regarding the level of development proposed in the DPD. Development in the AWE consultation zones will require specific consultation with ONR in line with policy CS8 of the Core Strategy.

5. Employment

Consultation comments:

- Impact on the viability of Pond House Farm agricultural unit
- Insufficient employment for residents to work in the village - leading to out commuting

Council response:

The site promoter has confirmed that additional land, close to Pond House Farm, would be provided and compensation provided to the tenant farmer should the site be allocated for development.

It is recognised that new residents will be likely to have similar commuting patterns to existing residents.

6. Flooding

Consultation comments:

- The culvert down the Hatch cannot cope with present volume of water during wet spells
- Increased flood risk as loss of land for absorption
- Drainage issues on the site appears to have been removed from the DPD, but in other areas has been used to reject a site
- Winter 2013/14 access roads to/from the village were badly affected by flooding – there has been no commitment from the Council to improve the situation

Council response:

The site is not within any designated flood areas (Fluvial or surface/groundwater). A flood risk assessment would be required to accompany any planning application for the site. This would need to consider all sources of flooding and set out mitigation measures for water generated on the site. Sustainable drainage systems (SUDs) would be required on the site.

There were no reported incidents of properties flooded during the Jan/Feb 2014 floods, although it is acknowledged that a number of local roads were flooded.

7. Highways and transport

Parking

Consultation comments:

- Parent parking at schools makes the roads almost impassable – people do not take notice of the double yellow lines

Council response:

Parking outside schools is recognised as an issue across West Berkshire. The Council work with schools to develop and implement travel plans, which encourage and support children and their parents to walk or cycle to school.

Public transport

Consultation comments:

- Site is on a good bus route
- No direct access to a railway station – villages with a station within walking distance should received more development
- Poor public transport links from the village – meaning a reliance on private vehicles

Council response:

It is noted that there is no railway station within the village; however, the site is located on a good bus route, linking Burghfield Common to Reading.

Road safety

Consultation comments:

- Road safety issues for children walking to school
- Clayhill Road is busy with parents and small children walking to school – additional traffic is a road safety hazard
- Recent incident of young person being knocked down on Reading Road

Council response:

Development of the site would result in improvements to link the site into the existing pavement network. Improvements as a result of development on this site could improve facilities for children walking to school.

Traffic and congestion

Consultation comments:

- There is good road access from Clayhill Road
- Improved infrastructure needed for the additional traffic/pedestrians associated with development
- Roads are becoming increasingly busier
- Traffic will cause congestion at junctions/roads through the village (Theale Road, Reading Road, Hawksworth Road, Hermits Hill)
- Increased journey times
- Can already take an hour to get into Reading – further delays are not acceptable
- Traffic calming measures encourage youths to drive as if they were chicanes
- Seriously question the basis for the additional traffic estimate – it must be considered a grossly inaccurate understatement - many households have more than 2 cars, therefore, the development must generate at least double the stated figure of peak time journeys
- Clayhill Road is impassable in snowy weather
- Roads poorly maintained, verges not cut and pavements obstructed
- Clayhill road has a 40mph speed limit but this is not policed or controlled

Council response:

Transport assessment work carried out by the Council in relation to the Mans Hill and Firlands appeal sites has shown that if both the appeal sites were to be developed the highway network would still operate within capacity. This work has been used as a proxy to show that development of either of the preferred options sites would not lead to issues of capacity on the highway network as the numbers involved are less than the two appeal sites. Transport Assessment work carried out for West Berkshire as a whole (although not specifically covering this area) does not show a significant impact on the highway network as a result of development of the Preferred Options HSA sites.

Transport Assessments/Statements would be required to accompany any planning application received and would need to consider the very local impact of the development. A Travel Plan would also be required, which would look at ways to encourage residents to walk and cycle, and consider alternative modes of travel to the car, especially for local journeys.

Traffic generation figures are determined using the national Trip Rate Information Computer System (TRICS) database of traffic surveys from many different land uses, including residential development. Therefore, this is considered a robust method for estimating traffic generation from a new development. Generally a three

bedroom house will generate six vehicle movements per day, of which about 10% will be during peak travel periods.

Walking and cycling

Consultation comments:

- Narrow pavements
- No provision for cyclists in the village
- The site is not sustainable in the sense of residents being able to walk to shops, doctors etc.
- Development will not encourage walking/cycling as there are no employment sites in walking distance and the site is not within walking distance of a station

Council response:

Development of the site would result in improvements to link the site into the existing pavement network. Improvements for cycling could be considered as part of the Transport Assessment/Statement for the site.

All new development will be required to produce a travel plan, which will look at ways to encourage walking and cycling for local journeys. While there might be limited opportunities for walking to local services and facilities outside the village itself, the site is on a bus route linking the site to Reading.

8. Infrastructure

Consultation comments:

- Lack of shopping facilities to support additional development
- Services are designed for village life and will be under significant pressure with additional development

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide

infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Education

Consultation comments:

- School are over populated
- Schools are in easy reach of the site
- New schools sites or extensions will be required in advance of development

Council response:

Consultation with the Local Education Authority (LEA) has indicated that a satisfactory solution to school place provision can be achieved for the allocated sites. A longer term feasibility study into education provision in Burghfield Common is to be undertaken.

Medical services

Consultation comments:

- Doctors surgeries have long waits for routine appointments

Council response:

The need for additional medical facilities will be considered through the Infrastructure Delivery Plan.

Utilities

Consultation comments:

- Raw sewage comes up through the drains in wet weather
- No development should take place until Thames Water have resolved the sewer flooding issues
- Low water pressure
- Emergency work recently carried out to repair leaks

Council response:

Consultation has taken place with Thames Water. They have raised concerns regarding water supply capability and waste water services and state that improvements to infrastructure are likely to be required. A water supply and drainage strategy would be required as part of any planning application should the site be allocated and this would be set out in any policy for the site.

9. Landscape/setting

Consultation comments:

- The developable area is at the highest part of the site, facing Burghfield Village
- Visual mitigation would be difficult – any planting would take a considerable amount of time to take effect
- The site is a natural buffer between Burghfield Common, Trash Green and Burghfield Village – loss of individual identity
- Development here appears to be against the Burghfield Village plan in terms of view points from within the countryside
- What allowance has been made for public open space?
- The site is in a prominent position
- Request for green belt between Burghfield Common and Burghfield Village be identified and maintained – would include this site
- The site can be seen from miles away
- Development would impact on the setting of the village

Council response:

Sensitive design will be critical to the development of the site, and would need to take into account the character of the surrounding area. Landscaping will be important on the site to reduce the visual impact on the surrounding area.

Development of the site will need to take into consideration the space between the villages in the area, and retain the visual gaps between the settlements.

Public open space will need to be provided in accordance with policy RL.1 of the West Berkshire District Local Plan (1991 – 2006) Saved Policies 2007.

Green Belt is a national designation, designated by the Government. There are no proposals to increase Green Belt designations. There is no Green Belt land in West Berkshire.

10. Personal

Consultation comments:

- Impact on wellbeing

Council response:

- Concern noted, however it is unlikely that any development of this site would have a direct impact on well-being.

11. Pollution

Consultation comments:

- Noise pollution from increased traffic
- Air quality
- Light pollution

Council response:

It is unlikely that development of the site will have a significant impact on pollution levels. All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution. It is unlikely that development of the site would have a significant impact on noise or air pollution levels.

12. Sustainability Appraisal/Strategic Environmental Assessment

Consultation comments:

- should have a '-' in relation to transport due to limited public transport and reliance on private vehicles
- Has a '-' for the site being Greenfield, but a '0' for conserving and enhancing the character of the landscape – surely development of this scale on a Greenfield agricultural site which is clearly visible will have a significant impact on the surrounding countryside
- Access to education is giving a '+' and yet there is no spare capacity at the schools - the SA/SEA is currently incorrect or based on dubious assumptions

Council response:

There is a good bus service through the village. The Lime 2, provides a 30min service between Burghfield Common and Reading Town Centre. The service runs all day (Monday to Saturday), and includes an hourly evening service. On Sundays there is an hourly service until 7pm. Therefore, the SA/SEA score does not need to be altered.

The site is close to the Junior school, and the LEA have confirmed that an education solution can be found for the schools in the area, therefore, there is not an issue regarding access to education and a positive score is appropriate.

In terms of the landscape, it is not considered that the development of the site would have a detrimental impact on the landscape, with appropriate mitigation measures.

13. Settlement boundary

Consultation comments:

- Only developing half the site will not provide a natural settlement boundary which would be provided on the other site promoted

- Loss of separation between villages if this site is developed

Council response:

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

14. Comments from Pond House Farm

- The site is the most important part of the farm business being close to the main farm buildings
- Farm is 20acres of good quality agricultural land
- During the summer months the field is used to accommodate calving – benefitting from being clearly seen from the farmhouse to ensure cattle's needs can be ascertained during calving
- The loss of 10acres would cause fragmentation of the whole farm unit
- Will do all legally possible to protect business and livelihood from being adversely affected by the proposal which could impact on the availability of the site during the plan period
- Seeking deletion of the allocation

Council response:

Comments are noted. Following a discussion with the site promoter, they have confirmed that additional land and compensation would be provided should the site be allocated for development. Only the western half of the site would be allocated for development.

15. Comments from the site promoter

- Support allocation of the site
- The site is close to local services/facilities
- There are no significant issues to affect development of the site
- The site is in flood zone 1
- There are no environmental designations to prevent development

- Development would accord with the NPPF and is sustainable, meeting all 4 tests of soundness

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Burghfield Rejected Sites

Consultation comments:

- 2 respondents fully agree with all rejected sites
- Burghfield is bombarded with planning applications that seek to change the village/rural lifestyle and character of living here

Council response:

Comment noted. The Council are looking to allocate sites through the plan led system to give local residents some degree of certainty as to which sites will come forward for development, and help prevent speculative planning applications for sites being approved.

BUR005: Land between Reading Road and Gully Copse

Responses received: 1

Comments from the site promoter:

- The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) sets out the site is ruled out due to its very edge of village location, but found that overall there would be a neutral effect on sustainability
- The approach is not consistent with the preferred sites which are in the same broad direction of growth for the village and also have a neutral impact on sustainability
- The site is not within a flood risk area
- There is no evidence of ecological or arboriculture constraint
- The site is well contained visually and in landscape terms
- Impact on residents would be minimal
- The site abuts the highways and benefits from existing access onto Reading Road – appropriate access could be achieved
- General direction of growth appears to be to the north and north east, this site is consistent with this and represents a logical future location for further growth
- Local services/facilities are within one mile
- There is a bus stop adjacent to the site
- Numbers attributed to the preferred options may not be fully deliverable
- The landowner is at an advanced stage of discussion with a leading house builder who will promote the site through the Housing Site Allocations DPD and Local Plan process
- The whole site is under one ownership
- Further technical work is being undertaken by landowner and proposed development partner – this will be made available to the council when available

Council response:

The comments are noted.

The SA/SEA is a decision aiding tool, not a decision making one. It looks to identify significant sustainability impacts. It is not uncommon for sites to have a similar outcome, with no significant negative sustainability impacts, and where this is the case other factors need to be taken into account when choosing a site to take forward for allocation. In this case the relationship to the existing settlement has been considered. The site is considered to be less well related to the existing built form than the sites being considered for allocation. Both the preferred options sites are within the north/eastern most extent of the village. Development of this site would be outside this, further extending the village to the north east.

It is recognised on the site assessment forms and in the SA/SEA that the site is not within a flood risk area. There is a small area of surface water flood risk along the southern boundary of the site

Part of the site is within a BAP habitat area.

Comments received through the preferred options consultation confirm that the preferred options sites are deliverable.

BUR007: Land at Firlands

Responses received: 1

Comments from the site promoter:

- Planning application for 125 dwellings on 6ha of the site submitted in July 2014
- It is the Council's duty to outline the reasons for rejection
- The site has been rejected for the following reasons
 - Right of Way (ROW)
 - The ROW does not apply to the 6ha planning application site
 - Ecological reasons
 - Benham's Gully
 - Does not apply to the 6ha planning application site
- Other key issues outlined in the SA/SEA are – scale of development, Greenfield, flood risk, Tree Preservation Orders (TPOs), overhead cables and AWE consultation zones. Only the Greenfield, TPOs and AWE issues are relevant for the 6ha site
- The council needs to make it clearer which site has been assessed as part of the process
- It is recommended that the 6ha planning application site and the larger 38.7ha site are assessed as two distinct sites both which are suitable for meeting the District's housing needs
- A site assessment should be completed for the 6ha site:
 - Scale of development
 - The site is of a suitable scale for Burghfield – the SA/SEA recognises a smaller area may be considered suitable for development
 - Flood risk
 - A suitable drainage solution is achievable as part of the proposals
 - Highway network
 - The council's highways officer has confirmed that the Transport Assessment (TA) is robust in terms of trip generation and road safety assumptions
 - The TA confirms development can be accommodated on the existing network
 - Public transport
 - The nearest bus stop is within 400m of the site
 - Footways/pavements
 - The scheme offers a new footpath on the south western side of Hollybush Lane and is capable of delivering new crossing point
 - Rights of Way
 - No ROW passes through the site
 - Protected species
 - Benham's Gully is not within/adjacent to the site
 - Relationship to the settlement
 - 125 dwellings is a suitable scale of development
 - Archaeology

- Archaeological investigation has taken place and the Council's archaeological officer has confirmed there will be no major impact on features of significance
 - There are no overhead cables on the site
- The Strategic Housing Land Availability Assessment (SHLAA) identifies a capacity of 600 dwellings for the larger site, however, it is anticipated that in the long term approx 300 dwellings including complementary uses (e.g. Community facilities and open space) would be delivered on the site.
- The council are using an out of date housing requirement figure and the identified sites will not meet the district's objectively assessed need and the language of "up to" is therefore, too restrictive
- The preferred sites should be the result of a systematic sustainability appraisal process and the most appropriate sites put forward – the sites put forward cannot be considered the most appropriate given the 6ha site has not been properly assessed
- BUR002/002A/004 has previously been subject to a rejected appeal – reasons for rejection have not been taken into account
 - Impact on local wildlife site – ecology has been cited as a reason for rejection of this site, but not used for the preferred options site
 - Ancient woodland - there is no reason for this site to be rejected on ecological grounds
 - Landscape/views – the Council need to undertake a more detailed assessment to fully understand the visual/landscape impact of these sites. More certainly on the landscape can be found for this site as the application is supported by a Landscape Visual Assessment (LVIA) – this should be taken into account
 - Connectivity – lack off/narrow pavements along Reading Road was cited by the planning inspector, this has not been adequately addressed by the Council. With this site it is proposed to construct a new pavement with new pedestrian/cycle crossings – it is not clear whether adequate mitigation could be provided for the Reading Road sites
 - Accessibility to services/facilities – this site is closer to key facilities (schools, village shop/post office, health centre) than the Reading Road sites
 - Gap between settlements – development of the Reading Road sites would reduce the gap between Burghfield Common and Burghfield Village. This is a constraint that has previously been advised as important to the parish council – this is not an issue for this site.
 - AWE – This site is in the outer AWE consultation zone, with BUR002/2A/4 being in the middle zone
- BUR015 (land adjoining Pondhouse Farm, Clayhill Road) has not been adequately assessed
 - Landscape – landscape assessments have not been carried out by the Council. This is a key issue and should be given more consideration. More certainty can be provided on this site as an LVIA has been produced
 - Archaeology – assessment of the archaeological potential on BUR015 has not taken place, this site has been subject to assessment showing there will be no major impacts
 - Local Wildlife Site (LWS) – no reference is made to the fact that BUR015 adjoins a LWS

- Accessibility to services/facilities - this site is closer to key facilities (schools, village shop/post office, health centre) than the Pondhouse farm
- Gap - development of the Pondhouse Farm would reduce the gap between Burghfield Common and Burghfield Village. This is a constraint that has previously been advised as important to the parish council – this is not an issue for this site.
- Drainage – the possible drainage issues on BUR015 have not been referred to in the SA/SEA. This site is accompanied by a drainage strategy which shows drainage is not a constraint for development
- AWE – This site is in the outer AWE consultation zone, with BUR002/2A/4 being in the middle zone
- This site is more preferable to the remaining preferred option sites in Mortimer and Woolhampton
 - MOR006: Land to the south of St John’s Church of England School, Victoria Road, Mortimer
 - This site offers a suitable access, which cannot be guaranteed at MOR006
 - This in the middle AWE consultation zone. This site is in the outer zone
 - MOR005: Land adjoining West End Road, Mortimer
 - Is in the middle AWE consultation zone. This site is in the outer zone
 - WOOL001: Land north of Bath Road, Woolhampton
 - There are potential contamination issues identified north of the Bath Road, there are none on this site
 - There is potential for noise and air quality issues that do not exist on our site
 - Is in the middle AWE consultation zone. This site is in the outer zone
 - WOOL006: Land to the north of the A4, Woolhampton
 - There is potential for noise and air quality issues that do not exist on our site
 - Is in the middle AWE consultation zone. This site is in the outer zone
- The Housing Site Allocations DPD should be postponed until the Local Plan has been reviewed and objectively assessed housing needs are in place, however, if the council are minded to continue, this site should be allocated to fine the plan sound (instead of the other Burghfield Common sites and MOR006).
- The allocation of the larger sites should be considered as part of the Local Plan review and is best placed to meet longer term housing needs.

Council response:

It is noted that a planning application was received for part of the site for 125 dwellings in July 2014. This was refused, and granted permission on appeal for up to 90 dwellings (July 2015). The Council are challenging this decision.

The site, as a whole, was submitted to the Council for inclusion in the SHLAA in 2008. The planning application for part of the site was submitted after the site selection work for the Housing Site Allocations DPD preferred options had been

completed and the DPD was in the Council's approval cycle ready for consultation to start at the end of July. Therefore, the Council were unable to consider the smaller site for allocation as part of the preferred options. The site promoter has continued to promote the whole site for development in the longer term, for up to 300 dwellings (rather than the 600 as referred to in the SHLAA); therefore, it is still appropriate to consider the site as a whole.

Following the preferred options consultation the smaller site has been assessed independently from the larger site (BUR007A). Development of the whole site is considered inappropriate to the role and function of Burghfield Common as set out by the Core Strategy. The desire of the site promoter to develop the whole site in the longer term does need to be taken into account when assessing the potential of the smaller site, as this could be considered as phase one of a larger development on the site. The smaller site is poorly related to the existing settlement as it is separated from the existing development by woodland.

The SA/SEA and site assessment forms set out the Council's reasons for rejection of the site. The Housing Site Allocations DPD preferred options document provided a very high level summary.

Buses do not run along Hollybush Lane, the nearest bus stop is on Reading Road or Clay Hill Road just over 400m from the site.

The Council's Core Strategy and the Housing Site Allocations DPD preferred options document refer to "at least" figures where stating the level of development that needs to take place across the district. It is anticipated that more than the Core Strategy's 10,500 will be allocated through the DPD to take into account the early period of the objectively assessed need figure in the new Strategic Housing Market Assessment (SHMA).

The DPD site selection process and SA/SEA considers all sites on a consistent basis considering only the red line outline of the sites. This means that all sites area treated fairly in terms of whether their location would be acceptable for development. The role of the DPD is to select the best sites for development. Therefore, the details submitted with a planning application are not expected to be submitted for a site being considered for allocation through the DPD at the early stage of site selection. Many of the issues are dealt with at planning application stage and are not factors that affect the deliverability, viability or developability of a site which are the factors considered when allocating a site. Where there is a question over one of these factors additional information has been required from the site promoter as a result of the preferred options consultation. Where further information is submitted this can be included as mitigation in the SA/SEA, but does not impact on the 'effect' score, as at this stage there is no formal commitment that a site will be delivered in the way currently proposed.

The previous appeal for BUR002/002A/004, in 2011, was a speculative planning application and in principle was contrary to planning policy at that time.

Any site being considered through the plan led system, if allocated, would establish the principle of development on the site. The proposals for the site exclude the

woodland from the developable area. The site specific policy will state that the woodland is to be retained. Details regarding landscape would be considered at planning application stage as the site is not within the AONB.

Improvements to the pavement network would be carried out as part of the development of the site.

The 'gap' policy was a former spatial planning tool, but was replaced a few years ago in favour of a landscape character approach. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' this approach is taken forward in Core Strategy policy CS19.

Consultation with ONR has taken place, and they have not raised any concerns regarding the level of development proposed for Burghfield Common. Further consultation will take place at proposed submission and on individual planning applications in the future.

The spatial strategy of the Core Strategy sets out that the settlements within the Settlement Hierarchy where development will be focused. Urban Areas will receive the majority of development, with Rural Service Centres (Burghfield Common/Mortimer) receiving some development and Service Villages (Woolhampton) receiving a more limited amount of development. The Housing Site Allocations DPD seeks to allocate sites under this framework. It would not be considered reasonable to put all development for one spatial area into one location when other locations have been assessed as having potential for development.

Mortimer Parish Council is in the process of developing a Neighbourhood Development Plan (NDP). The NDP will seek to allocate a site or sites for development of at least 100 dwellings in Mortimer.

The Housing Site Allocations DPD aims to fast track the allocation of housing sites. It will allocate the remained of the Core Strategy 'at least' 10,500 figure in accordance with the spatial strategy and provide some additional flexibility to meet the first part of the objectively assessed need set out in the SHMA. This will 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 of the NPPF (para 17). The Housing Site Allocations DPD will be followed immediately by a new Local Plan. The Council's commitment to this is set out in the Local Development Scheme.

The Berkshire SHMA is due for publication this autumn. This will set out the objectively assessed need for the housing market area, and give a figure for West Berkshire. Following this publication the Council will work with the other Local Authorities in the housing market area to determine the wider housing distribution and the requirements for each area.

BUR008: Land adjoining Mans Hill

Responses received: 2

Consultation comments:

- Single carriageway road is a genuine country lane which helps Burghfield Common to retain some of its rural character
- More should be done to retain Burghfield Common's character
- This development would really damage the character of the village

Council response:

Comments are noted. The site has not been put forward for allocation. The Council have concerns regarding access to the site and the impact on the character of the area, including Mans Hill itself.

Comments from the site promoter:

- The site should be allocated in order to deliver much needed housing and community facilities in the area
- SA/SEA
 - Road safety
 - It is not clear how a new development could reduce the number of road traffic accidents or improve road safety
 - All new development is designed to ensure safe access in accordance with standards for roads, visibility and access for vehicles and pedestrians
 - Criteria should be amended to assess the potential for a site to meet the prescribed standards
 - Previously Developed Land (brownfield) (PDL):
 - The use of PDL does not make a site more sustainable and prioritizing PDL is contrary to Para 111 of the NPPF
 - This criterion should not be used to determine whether a site is sustainable
- Evidence submitted as part of the planning application (14/00962/OUTMAJ) has not been taken into account
 - Green Infrastructure
 - A LVIA and Ecology assessment were submitted showing there would be no significant loss of Green Infrastructure
 - Development would retain the existing established vegetation structure and woodland areas along with extensive new planting
 - This would have positive effects and help the built elements can be integrated within the landscape and provides an appropriate transition between the site and the wider countryside setting
 - The SA/SEA should be changed from '0' to '+'
 - Road safety

- A Transport Assessment and Travel Plan have been submitted which show that access and road safety issues can be appropriately mitigated
 - This is supported by the officers report as part of the planning application assessment
 - The SA/SEA should be changed from '?' to '+'
 - Biodiversity and geodiversity
 - The LVIA and Ecology Appraisal submitted shows there will be no significant loss of GI and development of the site would have positive effects
 - The SA/SEA should be changed from '?' to '+'
 - Character of the landscape
 - There is no definition as to what the Council describe as 'very rural'
 - The submitted LVIA shows that a well designed site would enhance the local distinctiveness of the character of the landscape
 - The SA/SEA should be changed from '-' to '+'
 - Character of the built environment
 - The village has many services/facilities that cater for the needs of the village, so it is incorrect to say that the village is unable to cater for 210 dwellings which is only a small increase in housing compared to the existing village
 - It is not considered appropriate to rank the site as negative because it is Greenfield as this is contrary to the NPPF (para 11)
 - The SA/SEA should be changed form '-' to '+'
 - Previously Developed Land
 - Prioritising development on the basis on being brownfield is contrary to paragraph 111 of the National Planning Policy Framework (NPPF)
 - Criteria should be deleted
 - Greenhouse gas emissions
 - A travel plan has been provided
 - Compliance with applicable building regulations and standards would ensure the sustainability credential involved with the design, construction and materials would contribute to a reduction in greenhouse had emissions
 - The SA/SEA should be changed from '?' to '0'
 - Flood risk
 - The site is not within a designated flood zone (2 or 3), but this has not been given any credit in the site assessment
 - The site is located with some risk of surface flooding, mitigation measures (Sustainable Drainage Methodss) would appropriately cater for any flood risk as a result of surface water
 - The SA/SEA should be changed from '-' to '+'
- Information has been provided that should give the site a more positive than neutral impact in the SA/SEA and therefore, the site should be allocated for development
- The site is appropriately located adjacent to the settlement boundary and is in a suitable sustainable location for 210 dwellings

Council response:

New development is often accompanied by road improvements which can help to improve the road safety in the local area. There is potential for a new development to impact negatively on road safety if appropriate mitigation measures are not provided.

Paragraph 111 of the NPPF states that planning policies should encourage the effective use of land by re-using brownfield land. Therefore, it is appropriate to consider the use of brownfield land, where suitable, before the consideration of allocating Greenfield sites, which will automatically have more of an impact on sustainability as in many cases redevelopment of brownfield sites result in an improvements in the environment.

The DPD site selection process and SA/SEA considers all sites on a consistent basis considering only the red line outline of the sites. This means that all sites area treated fairly in terms of whether their location would be acceptable for development. It is the role of the site selection process to select the best sites for development from those which are potentially developable in the area. Therefore, the details submitted with a planning application are not expected to be submitted for a site being considered for allocation through the DPD at the early stage of site selection. Many of the issues are dealt with at planning application stage and are not factors that affect the deliverability, viability or developability of a site which are the factors considered when allocating a site. Where there is a question over one of these factors additional information has been required from the site promoter as a result of the preferred options consultation. Where further information is submitted this can be included as mitigation in the SA/SEA, but does not impact on the effect score, as at this stage there is no formal commitment that a site will be delivered in the way currently proposed.

The scale of the site is not considered to be appropriate given the role and function of the settlement, especially as other sites proposed around the village are better related to the existing settlement pattern. Development of this site would result in expansion of the village to the south, beyond the existing settlement pattern, where as development of the preferred options would extend the village within the existing maximum settlement extend to the north east.

BUR011: Benhams Farm, Hollybush Lane

Responses received: 1

Comments from the site promoter:

- The site was not selected due to factually incorrect reasons
- Development would extend beyond the existing settlement boundary
 - All sites being put forward have been done so because they are outside the settlement boundary. This reason is not being applied to all sites
- Ecological potential
 - An ecology report submitted as part of the promotion process stated there was no ecological issue with the site. The report appears to have been dismissed
 - All sites preferred or not would require an ecology report, so this should not be brought up as a reason for rejection when it appears to be ok for other sites to provide reports after they have become a preferred site
- Archaeology
 - Unsure of the proof of archaeological potential on the site – additional information requested from the council but not yet received
 - Acorn Gardens and Bramble Close were given consent and an archaeological survey requested at the time – nothing of interest was found
 - Benham's Farmhouse (and residential cartilage) was not included in the site area put forward and would remain as a residential dwelling
 - Benham's Farm barns are excluded from the site being put forward and have had consent for change of use to residential
- The proposed sites do not meet the level of housing required for this area and the preferred option sites have a number of issues (land ownership, woodland, surface water flooding) that could reduce the developable area
- The Burghfield Parish Plan states that future development should not have a detrimental impact from within the countryside – due to existing screening this site can be integrated in to the area without a major impact on the adjoining area
- No loss of trees, these all form a natural boundary and natural settlement boundary to the village
- There is already a main drain within the site so there would be no drainage issues
- The site can make better use of open space given as part of Acorn Gardens/Bramble Close – The site would allow direct access from Acorn Gardens to the area of open space to the north of Bramble Close
- There will be no impact on the rights of way network
- Benham's Farm is not currently being used for farming, so there will be no impact on employment
- The site is close to The Willink – students would have direct access and would not cause additional school parking
- Consent has already been granted for a new access off Hollybush Lane (involving the demolition of May Cottage) and erection of 2 new dwellings. This access has the capabilities to be made into a 4.8m road with 2m footways which would be acceptable to service 80 dwellings

- The site is available and under option to Charlesgate Homes so could be made available immediately

Council response:

Comments noted.

Development of this site would result in development further to the west than the existing building line of the village. The preferred options sites extend the village to the north east but do not extend beyond the existing furthest extent of the village.

Being outside settlement boundary is not a reason the site has been rejected, it is acknowledged that all sites being considered are, by definition, outside the existing settlement boundary.

The DPD site selection process and SA/SEA considers all sites on a consistent basis considering only the red line outline of the sites. This means that all sites are treated fairly in terms of whether their location would be acceptable for development. It is the role of the site selection process to select the best sites for development from those which are potentially developable in the area. Therefore, the details submitted with a planning application are not expected to be submitted for a site being considered for allocation through the DPD at the early stage of site selection. Many of the issues are dealt with at planning application stage and are not factors that affect the deliverability, viability or developability of a site which are the factors considered when allocating a site. Where there is a question over one of these factors additional information has been required from the site promoter as a result of the preferred options consultation. Where further information is submitted this can be included as mitigation in the SA/SEA, but does not impact on the effect score, as at this stage there is no formal commitment that a site will be delivered in the way currently proposed.

The developable area on preferred options sites has been reduced to take into account the limitations such as the woodland. Neither of the sites are themselves in an area at risk from surface water flood risk, although there is an area of surface water flood risk adjacent to BUR015 adjacent to the gully.

All sites will be required to provide appropriate screening to mitigate the impact of development on the landscape.

All sites are required to provide open space in line with policy RL.1 of the West Berkshire District Local Plan (1991 – 2006) Saved Policies 2007.

The only site where there could be an impact on a right of way is BUR007 (whole site), which was not a preferred option and is not being considered for allocation.

A number of planning applications have been submitted for part of this site. The more recent applications propose a private drive accessing 3-4 dwellings (one at appeal, the other pending consideration). The layout of the dwellings would prevent access being achieved into the remainder of the site, and therefore, access to the site is an additional concern that was not present at the preferred options stage.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Mortimer General Comments

Responses received: 36

1. Principle of Development

Consultation comments:

- No justification of the need to allocate houses in the EKV
- No small sites towards Mortimer Station or in Mortimer West End have been considered
- Lack of consideration of sites under 5 houses means you are discounting the best solution for sustainable village growth – these should be included in the overall housing number
- There are several sites closer to services and facilities that MOR005
- Mortimer village needs to be protected from overdevelopment
- There are enough brownfield sites to develop
- No recognition of the issues extra housing in the village will cause
- It is important that housing needs are met sooner rather than later to prevent speculative proposals on unallocated land
- There have been no larger sites (more than 10 dwellings) granted permission since 2013
- SHMA is due later this year and is likely to increase identified housing need – this could further result in speculative development proposals
- It is important the HSA has sufficient flexibility to ensure housing targets are met

Council response

Mortimer is a Rural Service Centre within the Core Strategy settlement hierarchy, and therefore, is expected to see some growth over the Core Strategy period. The Core Strategy was rigorously tested at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided that the East Kennet Valley would be able to take the amount of development proposed.

ADPP1 of the Core Strategy sets out the District Settlement Hierarchy. This sets out the spatial strategy for new development in West Berkshire. The majority of development is focused on the Urban Areas of Newbury, Thatcham and the Eastern Urban Area (Tilehurst, Calcot and Purley on Thames), with more limited development to be allocated in the Rural Service Centres (eg. Mortimer) to meet local needs and assist with the viability of village services and facilities. New development towards Mortimer Station or at Mortimer West End would not be in line

with the spatial strategy of the Core Strategy and therefore, sites could not be allocated here.

The majority of sites for under 5 dwellings are located within the existing settlement boundary; therefore, there is a presumption in favour of development meaning that these sites could come forward without needing to be allocated for development. In some spatial areas, consideration of these small sites has been taken into account when calculating the remaining requirement for allocation through the DPD as 'identified sites within settlement boundaries,' however; there are no identified sites within the settlement boundary within the East Kennet Valley. Some other sites of less than 10 dwellings are included in revised settlement boundaries.

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Mortimer Parish Council is in the process of developing a Neighbourhood Development Plan. The Council will allocate Mortimer Parish Council a minimum of 100 dwellings to be allocated within Mortimer village, the specific location of the allocation(s) will be done through the NDP

The HSA DPD aims to allocate development to boost the supply of housing in the District in the short to medium term. Longer term allocations will be made through a new Local Plan to be prepared once the HSA DPD has been adopted. It is recognised that in some spatial areas there have been few, or no allocations or new development for some time, the DPD will help to rectify this.

2. Neighbourhood Development Plan

Consultation comments:

- Support for NDP to allocate the site(s) in Mortimer
- Allows for significant local consultation and more widespread acceptance of the sites
- Local involvement in site selection
- Every confidence the NDP can deliver
- Use of local knowledge to determine where sites are best located
- Englefield Estate wishes to work with which ever organisation prepares the plan for Mortimer

Council response

The Council are working with and supporting the Parish in the development of the NDP. The Council will be allocating Mortimer a minimum of 100 dwellings to be allocated within or adjacent to Mortimer village, requiring the specific site or sites to be allocated through the NDP.

3. Emergency Planning

Consultation comments:

- Mortimer is in the outer AWE consultation zone
- None if the housing sites are in either of the current detailed emergency planning zones
- ONR would not advise against the inclusion of these sites

Council response

ONR have been consulted on the sites including within the Preferred Options DPD and have not raised any concerns regarding any of the sites put forward for Mortimer. Any site coming forward would need to comply with policy CS8 of the Core Strategy.

4. Highways and transport

Consultation comments:

- The 30min bus service between Mortimer Station and Reading Station, it is between Mortimer Common and Reading Station. There is no service on a Sunday
- There are no bus services between Mortimer and Tadley. There are 2 services on school days serving Mortimer Station
- Mortimer station is a mile from the centre of the village
- Lack of parking at the station
- Mortimer should not have a + for sustainable travel in the SA

Council response

The Council's Transport Services team have been consulted on the preferred options DPD and have said that there is an adequate service in Mortimer for the proposed level of development. New development often results in improved services, which would benefit the whole community.

It is recognised that the railway station is not within the village itself and has limited parking. The NDP is considering how improvements to parking at the station could be provided.

There are a number of options for sustainable transport within the village, therefore the positive sustainable.

5. Infrastructure

Consultation comments:

- Are there local jobs, schools, doctors, usable public transport services within walking distance of the site?
- Schools are at capacity (St John's is above capacity)
- There are not sports facilities close to the sites (there are a couple of tennis courts, cricket pitch and football pitch) nearest swimming pool is at Willink a couple of miles away. A misleading picture is being presented

Council response

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated once the sites have been confirmed (including any sites that have been allocated through the NDP) and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

The Council are working with the Parish Council and NDP Steering group to discuss education provision within the village.

The village is well service with outdoor sports facilities (tennis, cricket, football) as well as significant areas of public open space. Further improvements to and provision of sports facilities could be discussed through the NDP.

6. Settlement boundaries

Consultation comments:

- Would be drawn tightly around the preferred developable areas – shown in blue on the maps and exclude the rejected sites – this needs to be made clear

Council response

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation. The settlement boundary of Mortimer is being revised through the NDP.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

MOR005: Land adjoining West End Road, Mortimer

Responses received: 12

1. Principle of Development

Consultation comments:

- Mortimer has seen substantial housing growth in recent years (in the last 10 years about 300 dwellings have been built)
- Sites should be allocated by the Neighbourhood Development Plan (NDP)
- Site on its own does not deliver enough housing, another site would also be required
- Loss of village community
- Loss of agricultural land – the country is not self sufficient in food production and agricultural land should be protected
- Allocation of the site is not supported by the Parish Council (*comment not made by the parish council*)
- Development would turn the village into a small town
- Concerns about the sustainability of the site

Council response:

Mortimer is a Rural Service Centre within the Core Strategy settlement hierarchy, and therefore, is expected to see some growth over the Core Strategy period. The Core Strategy was found sound by an Independent Inspector who agreed that based on the evidence provided that the East Kennet Valley would be able to take the amount of development proposed.

Mortimer Parish Council is in the process of developing a Neighbourhood Development Plan (NDP). The Council will allocate Mortimer Parish Council a minimum of 100 dwellings to be allocated within or adjacent to Mortimer village, the specific location of the allocation(s) will be done through the NDP. The NDP is well progressed and includes the allocation of MOR006.

All sites have been subject to sustainability appraisal/strategic environmental assessment (SA/SEA) which considers environmental, economic and social impacts of development of a site on a consistent basis. The assessment of this site did not result in any significant impacts on sustainability.

Spatial strategy

Consultation comments:

- Should be looking at inner towns for development
- Every village should take 20 houses, Mortimer is taking the brunt of housing
- How many houses have been built in Newbury in relation to Mortimer? (per capita?)

Council response:

The Housing Site Allocations DPD is not reassessing the housing requirement or distribution set out in the Core Strategy. ADPP1 of the Core Strategy sets out the District Settlement Hierarchy. This sets out the spatial strategy for new development in West Berkshire. The majority of development is focused on the Urban Areas of Newbury, Thatcham and the Eastern Urban Area (Tilehurst, Calcot and Purley on Thames), with more limited development to be allocated in the Rural Service Centres (eg. Mortimer) to meet local needs and assist with the viability of village services and facilities.

The Core Strategy allocated 6,300 new homes to Newbury and Thatcham, the majority of which are to be located in Newbury. Two strategic sites have been allocated totalling 2,500 dwellings and there is a remaining allocation of 1,000 dwellings to be delivered through the HSA DPD. The East Kennet Valley, in which Mortimer sits, is only allocated 800 dwellings over the plan period. Of this 800 only approximately 240 are left to allocate through the DPD in Burghfield, Mortimer and Woolhampton, therefore.

Land use

Consultation comments:

- Use of redundant buildings that could be refurbished or redeveloped for housing
- Use of landbanks?

Council response:

Where appropriate, the Council encourages the reuse of redundant residential buildings, however these are often in private ownership and therefore, the Council cannot ensure derivability of refurbishment or redevelopment.

It is not currently possible to force developers to build out their landbanks – their rate of development is generally based on commercial factors.

2. Density

Consultation comments:

- Higher density is used here than in other preferred options sites – this density is inappropriate for Mortimer
- Density, compared to Woolhampton, would not be medium density

Council response:

A standard density has been used across all sites for the purposes of the preferred options DPD – for this site, this will be taken forward through the NDP. 30dph has been used by the Council across the majority of the spatial areas. All densities are indicative, and the final density to be used for a site will be subject to negotiation

Existing housing densities in Mortimer range from approximately 13dph at The Avenue/Orchard Road, to approximately 35dph at Croft Road, Leigh Fields and Stephens Road. The Strawberry Fields development has an approximate density of 28dph. The density of any new development would be expected to take into account the character of the surrounding area.

3. Design

Consultation comments:

- New dwellings do not reflect the character/style of the existing dwellings
- New houses don't have gardens

Council response:

Development will need to comply with the policies of the Core Strategy, and, in this case, the NDP. It will also need to comply with the Council's quality design guidance and Manual for Streets. All development will need to take into account the character of the area.

Detailed design and site layout is a matter to be discussed at the planning application stage.

It is anticipated that the NDP will include supplementary design guidance to guide development of any sites coming forward within the NDP designated area.

4. Ecology

Consultation comments:

- A range of wildlife is present on the site

Council response:

The Council's ecologist has been consulted on all sites, and has not raised any concerns regarding development of this site.

5. Flood risk

Consultation comments:

- Surface water flood risk on the site

Council response:

It is recognised that there is a risk of surface water flooding to the south of the site. The site is greater than 1ha in area, therefore, a flood risk assessment would be required, which would need to consider all sources of flooding and propose mitigation measures. Mitigation measures would include Sustainable Drainage Systems (SUDs).

6. Highways and transport

Traffic/congestion

Consultation comments:

- Commuter traffic
- Traffic outside schools
- Increased traffic could lead to more accidents/near misses at the mini roundabout

Council response:

The sites are not expected to generate significant amount of traffic, and therefore, there will be limited impact on congestion as a result of development of the sites. Transport Assessments/Transport Statements would be required to accompany any

planning application submitted, should the site be allocated. It is at this stage that any local highway improvements would be discussed and agreed upon. A Travel Plan would also be required, setting out ways residents would be encouraged to use alternative modes of travel and reduce reliance on the private car.

Traffic outside schools is a recognised as an issue across the District. The Council works with schools to develop and implement School Travel Plans which encourage and support pupils to walk and cycle to school, therefore, reducing congestion and improving road safety outside the school.

Parking

Consultation comments:

- Lack of parking at services/facilities (doctors)
- Lack of parking at the station with limited space to provide more
- Increase in pavement parking
- Parking at Strawberry Fields is already an issue

Council response:

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development (including Strawberry Fields), and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking. The new parking policy should ensure that developments provided for their own parking need without resulting in pavement parking.

The limited parking facilities at the railway station are recognised.

Parking at doctor's surgery – private facility for them to manage the parking?

Public Transport

Consultation comments:

- Poor public transport, especially on the Sunday leading to reliance on cars
- Acceptable public transport services in Mortimer

Council response:

Consultation has taken place with the Council's Public Transport Service, they have not raised any concerns regarding development and levels of bus services within Mortimer. The Lime 2/2a service provides a 1/2 hourly service between Mortimer and Reading Station on weekdays and Saturdays. There is also a weekly shopper service to Newbury town centre on a Tuesday and Thursday morning.

There is a railway station within Mortimer Parish, although it is recognised that it is not within the village itself, with limited parking available.

7. Infrastructure

Consultation comments:

- If agricultural land is no longer required it could be used for allotments
- Insufficient amenities to serve the community
- Village facilities need to be taken into consideration before more building takes place
- The site is less accessible to the village centre

Council response:

Existing pressure on some services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. This will take into account any site that is allocated through the NDP.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL. If the parish has an adopted NDP, they will be able to take responsibility for spending 25% of CIL receipts.

Education

Consultation comments:

- Schools are full
- School is not in the village, meaning most children would be driven to school
- The site could be used for a new junior school and the old school site used for housing

Council response:

The Council are working with the Parish Council and the NDP steering group to discuss education provision within the village.

Medical services

Consultation comments:

- Doctors are struggling to cope, especially since Strawberry Fields was built
- Recent planning application for doctors surgery rejected

Council response:

No comments have been received from the Doctor's surgery suggesting that they are operating over capacity. The IDP will consider the requirements for new/additional medical facilities as a result of new development. It is understood that there is an aspiration to take this forward through the NDP.

Utilities

Consultation comments:

- Increased pressure on the sewage system

Council response:

Consultation has taken place with Thames Water. They have raised concerns regarding water supply capability and waste water services and improvements to

infrastructure are likely to be required. A water supply and drainage strategy would be required as part of any planning application should the site be allocated.

8. Pollution

Consultation comments:

- Light pollution
- Noise
- Air quality

Council response:

It is unlikely that development of the site will have a significant impact on pollution levels. All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design Supplementary Planning Document (part 5, External Lighting) and any additional requirements from the NDP to reduce instances of light pollution. It is unlikely that development of the site would have a significant impact on noise or air pollution levels.

9. Settlement boundary

Consultation comments:

- Outside the settlement boundary
- Creation of urban sprawl
- Would extend the village beyond its current limited
- Sets a dangerous precedent for future development

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The review of settlement boundaries in Mortimer will be carried out via the NDP.

10. Comments from the site promoter

- Support allocation of the site
- The site is well related to the village and close to a range of services and facilities
- The site is adjacent to existing residential development which will reduce the visual impact of development
- Access could be provided from West End Road

- There are no significant constraints
- Would comply with the National Planning Policy Framework.

Council response:

Comments noted.

The allocation of sites in Mortimer will be done by the Parish Council through the Neighbourhood Development Plan.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

MOR006: Land to the south of St. John’s Church of England School, Victoria Road, Mortimer

Responses received: 29

1. Principle of Development

Consultation comments:

- Housing should be allocated by the Neighbourhood Development Plan (NDP)
- Development does not meet the Core Strategy policy
- Development is not justified where it is
- Development here is not sustainable
- Loss of village character/community
- The site is centrally located
- Can accommodate virtually all houses required
- Would not fit within the village environment
- Impact on tranquillity
- Impact on existing property values
- Proposing 100 dwellings on one site is not justified
- Need to consider the rural context of adjacent dwellings
- Insufficient consideration of feasibility (access/building potential)
- The village suffered enough with the Strawberry Fields development
- Only sites from one land owner have been put forward – due process has not been followed as other sites have been overlooked
- A number of properties are currently for sale, but with no buyers, new houses would be no different
- Need to protect the village, not destroy it
- Not justified or effective
- Mortimer is not a service centre, it is a thriving, safe village – these plans will destroy this
- Support allocation of the site
- The southern part of the site could be suitable in the longer term
- Drive for this site has been lead by developers and access created prior to the announcement of site selection

Council response:

Mortimer is a Rural Service Centre within the Core Strategy settlement hierarchy, and therefore, is expected to see some growth over the Core Strategy period. The Core Strategy was found sound by an Independent Inspector who agreed that based

on the evidence provided that the East Kennet Valley would be able to take the amount of development proposed.

Mortimer Parish Council is in the process of developing a Neighbourhood Development Plan. The Council will allocate Mortimer Parish Council a minimum of 100 dwellings to be allocated within Mortimer village, the specific location of the allocation(s) will be done through the NDP. The NDP is well progressed and includes the allocation of this site.

All sites considered as part of the preferred options consultation have been put forward by site promoters and developers. They have then been assessed by the Council and subject to sustainability appraisal/strategic environmental assessment (SA/SEA) in order to find the best sites for allocation. The assessment of this site did not result in any significant impacts on sustainability.

The ownership of a site is not taken into account in the Council's decision making process.

Consideration of the local character of an area is a crucial factor in site design.

Spatial strategy

Consultation comments:

- Core Strategy is flawed, why does it require new homes to be built as close to shops as possible and adjacent to village boundaries
- Site is too large and out of keeping with existing settlement size
- Site size exceeds requirement for the area
- Homes should be equally distributed throughout the parish in small clusters that would be easily absorbed
- Larger towns should be expanded as they are more able to cope with demands
- Newbury could take more development - how many dwellings have been built in Newbury compared to Mortimer (per capita)?
- All village should take a small number of houses (e.g. 20)
- Use of landbanked land rather than agricultural land

Council response:

The Core Strategy sets out that new development should be focused on the most sustainable settlements. Policy CS13 (Transport) requires new development to have good access to key services and facilities, therefore, reducing the need to travel to reach these facilities. Locating development close to local shops and on the edges of existing settlements helps to deliver this policy.

ADPP1 of the Core Strategy sets out the District Settlement Hierarchy. This sets out the spatial strategy for new development in West Berkshire. The majority of development is focused on the Urban Areas of Newbury, Thatcham and the Eastern Urban Area (Tilehurst, Calcot and Purley on Thames), with more limited development to be allocated in the Rural Service Centres (e.g. Mortimer) to meet local needs and assist with the viability of village services and facilities.

The Core Strategy allocated 6,300 new homes to Newbury and Thatcham, the majority of which are to be located in Newbury. Two strategic sites have been allocated totalling 2,500 dwellings and there is a remaining allocation of 1,000 dwellings to be delivered through the HSA DPD. The East Kennet Valley, in which Mortimer sits, is only allocated 800 dwellings over the plan period. Of this 800 only approximately 240 are left to allocate through the DPD in Burghfield, Mortimer and Woolhampton.

Unfortunately the Council has no powers to force developers to develop their landbanks. This is their commercial decision.

Alternative sites

Consultation comments:

- Building housing on the school site (and moving the school) would lead to a larger development nearer the station
- Consideration of development north of Welshmans Road where trees have been felled – has good access and is large enough to incorporate schools, doctors, dentist and shops
- MOR005 has clearer and easier access and would not add to an already dangerous situation
- Infill on existing housing
- Sites nearer the station would be better as people could use the train and reduce traffic through the village

Council response:

The sites proposed for allocation are in line with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). While other sites may be being promoted, or considered available, (e.g. Land near the station, Welshman's Road) their allocation would be contrary to the spatial strategy of the core Strategy.

All sites submitted to the Council have been assessed on a consistent basis. The NDP is taking on the role of allocating sites for Mortimer, and have been able to access the Council's evidence base. The preparation of the NDP must be consistent with Core Strategy policy.

Land use

Consultation comments:

- There is enough brownfield land to develop on without developing Greenfield sites
- Loss of agricultural land

Council response:

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary.

2. Consultation

Consultation comments:

- Poorly timed and rushed

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection. A second formal period of consultation will take place in Autumn 2015.

The Neighbourhood Development Plan is subject to separate consultation arrangements.

3. Density

Consultation comments:

- Density higher than other areas in the EKV (e.g. Woolhampton)

Council response:

A standard density has been used across all sites. 30dph has been used across the majority of the spatial areas. All densities are indicative, and the final density to be used for a site will be subject to negotiation at the planning application stage.

Existing housing densities in Mortimer range from approximately 13dph at The Avenue/Orchard Road, to approximately 35dph at Croft Road, Leigh Fields and Stephens Road. The Strawberry Fields development has an approximate density of 28dph. The density of any new development would be expected to take into account the character of the surrounding area.

4. Design

Consultation comments:

- Architecture should be in keeping with the rural nature of the village

Council response:

Development will need to comply with the policies of the development plan, and be in line with the Council's quality design guidance and Manual for Streets. All development will need to take into account the character of the area.

Detailed design and site layout is a matter to be discussed at the planning application stage.

It is anticipated that the NDP will include supplementary design guidance to guide development of any sites coming forward within the NDP designated area.

5. Ecology

Consultation comments:

- Loss of wildlife habitat (inc. bats, badgers, foxes, frogs, toads, deer, red kites, owls, cuckoos)
- Trees should be planted down the west side of The Avenue to screen the site

Council response:

The Council's ecologist has been consulted on all sites, and has not raised any concerns regarding development of this site.

Landscaping/habitat mitigation measures would be required, as green infrastructure, and would be considered at the planning application stage.

6. Flood risk

Consultation comments:

- Increased storm water discharge is likely to find its way into the water course to the west of The Avenue – the water course does not have the capacity for additional water and could result in runoff onto The Street

Council response

A Flood Risk assessment would be required to accompany any planning application for the site. This would need to consider all sources of flooding and set out mitigation measures for dealing with water generated on or displaced from the site. Sustainable drainage systems (SUDs) would be required.

7. Highways and transport

Traffic/congestion

Consultation comments:

- Distance to junior school means many parents drive
- HGVs would be an inconvenience in an already busy village
- Local roads unadopted/unmade

Council response:

The sites are not expected to generate significant amount of traffic, and therefore, there will be limited impact on congestion as a result of development of the sites. Transport Assessments/Transport Statements would be required to accompany any planning application submitted, should the site be allocated. It is at this stage that any local highway improvements would be discussed and agreed upon. A Travel Plan would also be required, setting out ways residents would be encouraged to use alternative modes of travel and reduce reliance on the private car.

The distance to the junior school and the potential impact on parents driving to school is recognised. The Council works with all schools to develop and implement

School Travel Plans which encourage and support pupils to walk and cycle to school, therefore, reducing congestion and improving road safety outside the school.

All roads within the new development would be required to be of adoptable standard.

Access

Consultation comments:

- Access is an issue – TA Fisher development precludes access from the north and Drury Lane access would require significant works
- Poor sight lines
- Sites should not be proposed without access solutions so that the impact on neighbouring properties can be seen

Council response:

It is understood that access arrangements to the site have been agreed with TA Fisher, and access will be provided through the TA Fisher site. Appropriate sight lines can be provided onto The Street.

Parking

Consultation comments:

- Lack of parking at the doctors surgery
- Station car parking is inadequate
- Limited parking in the village for using local businesses
- Lack of parking
- Parking at Strawberry Fields is already an issue

Council response:

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development (including Strawberry Fields), and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is a recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking. The new parking policy should ensure that developments provided for their own parking need without

resulting in pavement parking. The NDP will need to comply with other policies of the development plan.

The limited parking facilities at the railway station are recognised. The NDP is looking at whether additional land could be allocated to provide additional parking at the station.

Public Transport

Consultation comments

- Limited public transport opportunities within the village

Council response:

Consultation has taken place with the Council's Public Transport Service, they have not raised any concerns regarding development and levels of bus services within Mortimer. The Lime 2/2a service provides a 1/2 hourly service between Mortimer and Reading Station on weekdays and Saturdays. There is also a weekly shopper service to Newbury town centre on a Tuesday and Thursday morning.

There is a railway station within Mortimer Parish, although it is recognised that it is not within the village itself, with limited parking available.

Road safety

Consultation comments:

- Road Safety hazard, especially at school drop off/pick up
- Drop off outside the school is an issue

Council response:

The Council's Road Safety team work with schools to promote safety outside schools. Schools are encouraged to develop a school travel plan which can help to reduce the number of cars outside the school gate, therefore, improving safety outside the school.

8. Infrastructure

Consultation comments:

- Infrastructure should be considered before planning decisions are made
- Need to retain footpath and culvert that runs along The Avenue

Council response:

The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL. Parishes that have developed a Neighbourhood Development Plan received 25% of the CIL recipes generated within the parish.

The existing footpath and culvert along The Avenue will need to be retained or diverted.

Education

Consultation comments:

- Schools are at capacity
- Consideration could be given to using this site for a school and using the school site for housing – a centre village schools would benefits the community
- Combine the infant and junior schools
- Secondary pupils have to go out of the village for school
- Impact on future expansion plans for St John's School

Council response:

The Council are working with the Parish Council and the NDP steering group to discuss education provision within the village. The NDP steering group are keen to allocate land for a new infant school. It is unlikely that the junior school will be moved, as there is existing space on the site for expansion, if it is required.

It is noted that secondary school pupils have to travel to Burghfield Common for school.

Medical services

Consultation comments:

- No mention of increased dental or doctors surgeries
- Move the doctors surgery to a new site with adequate parking

Council response

No comments have been received from the Doctor's surgery suggesting that they are operating over capacity. The IDP will consider the requirements for new/additional medical facilities as a result of new development and will include any sites set out in the NDP. It is understood that the NDP is considering the future of the Doctor's surgery.

Utilities

Consultation comments:

- Water pressure is already poor and would need substantial work to improve and cope with additional demand
- Sewage capacity – could they cope with an additional 100+ homes?

Council response:

Consultation has taken place with Thames Water. They have raised concerns regarding water supply capability and waste water services and improvements to infrastructure are likely to be required. A water supply and drainage strategy would be required as part of any planning application should the site be allocated. This should be set out in any policy for the site.

9. Landscape/Setting

Consultation comments:

- Site is exposed and can be seen from the south west, therefore, would cause a blot on the landscape
- Loss of green space
- Devastating for residents who overlook the site
- Would like some division between the existing settlement and any new homes (e.g. woodland)

Council response:

Mitigation measures will be required to reduce the impact of development on the surrounding landscape. If only part of the site is being considered for allocation this will reduce the impact on the surrounding area. Landscaping and areas of public open space would be required, and would be considered at the planning application stage.

10. Pollution

Consultation comments:

- Generation of light pollution – new development should not have street lights to limit light pollution.
- Noise

Council response:

It is unlikely that development of the site will have a significant impact on pollution levels. All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution. It is unlikely that development of the site would have a significant impact on noise or air pollution levels.

The NDP is considering the approach to street lighting for new development.

11. Settlement boundary

Consultation comments:

- Would not be possible to restrict growth into the countryside – site is much larger than proposed developable area)
- Outside settlement boundary
- Site boundary should reflect the developable area

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The Mortimer settlement boundary is being reviewed as part of the NDP process.

12. Comments from the site promoter

- Support allocation of the site
- The site is well related to services/facilities
- Welcome the Parish Council comment that this is the most logical site for development
- Discussion are taking place with TA Fisher regarding access – this can be resolved
- Have met with the Parish Council are aware of their concerns regarding doctors surgery, schools and station parking – Are prepared to meet with the Council to discuss what improvements are required and how these could be delivered
- Development would accord with the NPPF

Council response:

Support for allocation of the site is noted. It is noted that the access arrangements for the site have been resolved. The allocation of sites in Mortimer will be done by the Neighbourhood Development Plan, although the council may include a site as a reserve site in case the NDP does not come forward within a realistic timeframe.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Mortimer Rejected Sites

MOR001: Land at Kiln Lane

Responses received: 4

Consultation comments:

- The site is used by walkers and other enjoying the countryside and use of the ROW network

Highways and transport

- Access via Kiln Lane is not possible, it would need to come from The Street which is on a blind bend
- Access would need to avoid mature trees inc. the landmark Sequoia

Infrastructure

- A potable water pipe crosses north to south on the site
- Possible electricity cable buried across the site (east to west). The overhead cable ends on the boundary between Oakridge house and the lower part of the site

Flooding

- Drainage from the field runs off into Kiln Road
- Neighbouring properties have had to had land drains made to deal with drainage requirements
- There is suspicion of a false water table in the field

Ecology

- Badgers of the site
- Barn owls hunt on the site
- Deer traverse the site

Comments from the site Promoter:

- The reasons for rejection are not considered appropriate
- While the site is further from some services/facilities it is within 800m of all the main facilities in the village and is closer to the primary school than the proposed sites and the railway station
- The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) acknowledges there are a number of positive impact on sustainability due to the site's location

- While the site is surrounded by open countryside on three sides, the western boundary adjoins the settlement boundary
- Dense areas of woodland soften and obscure the development from the north/south
- The SA/SEA acknowledges that mitigation could minimise the landscape impact
- The proposals are prepared with the wider landscape character in mind and propose a significant degree of green infrastructure to be provided on the site, therefore the SA/SEA should be updated
- An appropriate access, by way of a roundabout junction, could be developed on to The Street, with appropriate sight lines and without any highways safety impact. It is unclear why access has been included as a reason for rejection of the site as the SA/SEA does not highlight any issues
- The site has recently been proposed for development of up to 110 dwellings (not 151 as set out in the DPD) – the smaller number should be assessed in the SA/SEA
- Access is a significant issue for MOR006, which could impact on deliverability, this is not an issue for this site
- MOR006 is considered undeliverable in the short term and potentially longer term. All issues with this site can be overcome
- An archaeological desk based assessment has taken place and there is no evidence that indicates prehistoric or Roman remains on the site and no evidence of brick making, the SA/SEA should be updated to reflect this
- The right of way would be retained and enhanced through surfacing material. The SA/SEA should be updated to reflect this
- Mitigation and enhancement measures would reduce the impact on biodiversity/geodiversity therefore, the SA/SEA should be updated
- There is no flood risk on the site and surface water flood risk could be mitigated by Sustainable Drainage Systems (SUDs) – therefore the SA/SEA should give a neutral score

Council response:

Housing allocations in Mortimer will be allocated through the Neighbourhood Development Plan. This site is not the Parish Council's preferred site for allocation as they wish to focus development close to the centre of the village.

Access to the Parish Council's preferred site has been resolved.

No change is required to the SA/SEA. The SA/SEA takes a look at all sites on a consistent basis, assessing the potential impact without mitigation. Mitigation measures that are proposed, or could be provided are then noted, as a way that could reduce the impact, but they are not used to change the impact score. This is due to the fact that there can be no guarantee that development will come forward in the way envisioned at this stage.

MOR002: Land adjacent to College Piece

Responses received: 1

Comments from the site promoter:

- The site should be included within the settlement boundary
- The site has been rejected due to Tree Preservation Orders (TPOs), however, the TPO is about to be removed and the central trees felled – this would remove any constraints to the development of this site
- Development of the site would fit neatly with the adjoining development
- The original description of the site was inaccurate and had to be adjusted to properly reflect its character
- The site is not capable nor allowed for informal recreation
- The right of way can easily be retained and direct access to College Piece created

Council response:

The TPO remains on the site, and covers all trees and woodland structures, including any future trees. The Council has agreed a woodland management plan, with the Forestry Commission and Parish Council, which includes the removal and restocking of trees, retaining the TPO on the site.

Even if the TPO had been removed, the site does not meet the requirements of the Settlement Boundary review criteria and therefore, could not be included within the settlement boundary.

MOR008: Land at the north east corner of Spring Lane

Responses received: 3

Consultation responses:

- The site does not suffer from surface water flooding
- When the ditches are maintained the site does not flood
- Use of SUDs would make the site usable – if not then questions are raised about the suitability of the ditch along MOR006 and MOR001

Comments from the site promoter:

- The site is close to local services/facilities and is therefore, in a sustainable location
- The north east corner of the site is in flood zone 1, therefore flood risk should not be used to rule the site out
- PBA have been commissioned to undertake a flood risk and vulnerability assessment relating to surface water flows on the site. While there is potential for surface water to cross the site north to south this could be readily mitigated by constructing interceptor ditches or drains along the southern, eastern and western boundaries
- There is no evidence of spring activity on the site, but it is acknowledged that ground water could emerge on the site. This could be mitigated by creating collector drains at appropriate locations
- The site is on sloping land, therefore, is not in an area when surface or ground water would collect, therefore, flooding issues identified could easily be mitigated
- The site could easily be incorporated in to the exiting settlement pattern
- Given the need for flexibility in the supply of housing sites the site would accord with the NPPF as the flooding issues can be overcome.

Council response:

Housing allocations in Mortimer will be allocated through the Neighbourhood Development Plan. This site is not the Parish Council's preferred site for allocation as they wish to focus development close to the centre of the village.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

WOOL001: Land North of Bath Road, Woolhampton

Number of responses received: 12

Some consultation responses commented on existing anti-social behavior. It is not the purpose of this consultation to deal with existing issues of anti-social behaviour. Core Strategy policy CS14 (Design Principles) requires new development to 'create safe environments, addressing crime prevention and community safety.'

1. Community Infrastructure Levy and s106

Consultation comments:

- Any S106 / community Infrastructures levies arising, would be spent In Midgham and not Woolhampton.

Council response:

It is noted that the site is within Midgham Parish not Woolhampton. The location of development is considered in relation to the settlements of the settlement hierarchy, not parish.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

2. Density

Consultation comments:

- Too many houses suggested for the size of the site.
- In addition, the proposal for 20 dwellings on this site would be a considerable over-development of the site, with a high level of impact on the amenity of the properties which back onto this site.
- An addition of 50 dwellings in the village would seriously over-develop the area and put a strain on the very minimal existing resources.

Council response:

Housing densities set out in the preferred options DPD are based on an indicative figure across the whole district. Final densities will be agreed in discussions with the site promoter. As a service village, Woolhampton has been assessed as having capacity for a small amount of development. A choice needs to be made from the two preferred options sites in Woolhampton. The intention of the consultation was to

gauge views and gather additional technical evidence. It is not intended to allocate both sites.

3. Green Infrastructure:

Consultation comments:

- Implementation of effective measures to avoid or mitigate for indirect impacts on local Ancient Woodland and Local Wildlife Sites will help ensure that the policies of the National Planning Policy Framework and the West Berkshire Core Strategy are met.

Council response:

The Council's Ecologist has stated that, water from the site will flow via a ditch system to the Kennet and Avon canal and will avoid both Sites of Special Scientific Interest (SSSIs). Sustainable Drainage Systems (SUDS) will be required on site so there will be no effects on groundwater flow to reedbeds. In addition, a 15m wide stand-off area (buffer) is required to help protect the Semi Ancient Natural Woodland adjacent to the site. These requirements will be set out in a policy for the site, should it be allocated.

4. Highways and Transport

Consultation comments:

Highway network/traffic

Consultation comments:

- New Road Hill is already a bottleneck. It would be more difficult and hazardous turning right onto the A4.
- Increase in traffic coming turning into and exiting New Road Hill on to A4.
- The additional traffic movement arising from this site, onto New Road Hill, would have an adverse impact on what is a relatively small road.

Council response:

Transport Assessment work has been carried out and indicates that the development of the sites will not have a significant impact on traffic levels. Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider the local impact of the development, including access, road safety and any other necessary mitigation measures. A travel plan, promoting the use of alternatives modes of travel to the car, would also be required.

Access

Consultation comments:

- The proposal is not viable because there is no access off New Road Hill further up the road which would enable this site to be developed.

Council response

The Highways and Transport Department have stated that the proposed site should not have a significant impact on the highway network. Access would need to be taken from New Road Hill rather than the A4.

Road safety

- Junction is already difficult to get in and out of at peak times and can encounter large, heavy vehicles travelling eastbound and braking at high speed in order to get through the speed camera without triggering it. Speed of traffic on that side of the road is not consistent. Increase in risk of accidents.
- Poor visibility/sight lines at the A4/New Road Hill junction.

Council response:

The specific impact on local road junctions would be considered at planning application stage. Development of the site would be required to ensure no negative impact on road safety.

Adequate sight lines would need to be provided. This would be dealt with at planning application stage.

Walking

- New Road Hill is heavily used and not wide enough to have a pavement, making it dangerous for those residents who live along the side of the road to walk on it.

Council response:

Footways would need to be provided to link the site into the existing footway network. This would be required in a policy for the site.

5. Infrastructure

- Development of this size on the area of land proposed cannot be sustained by the current village infrastructure without significant investment to the village car parking facilities, transport links and local amenities.

Council response:

Woolhampton has been recognised as a Service Village in the Council's Core Strategy Settlement Hierarchy. Service villages have been identified as settlements with a limited range of services, with potential for some additional limited development. Not all the sites put forward in the Preferred Options consultation are proposed to be allocated for development, they were options from which the site, or sites would be chosen from.

There is a railway station in Woolhampton (Midgham) and a regular bus (approx 30min) service along the A4 (Jet Black 1) linking Woolhampton to Newbury to the west and Reading to the east.

In terms of parking, development should not have an impact on the village car park. New parking standards for residential development were consulted upon as part of the Preferred Options DPD. These standards are based on a number of factors, including local car ownership and previous parking issues caused by new development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Sewerage:

- There have been serious problems with sewage leakage in Station Road in relation to the Thames Water Pumping Station.

Council Response:

Thames Water has raised concerns regarding wastewater services in the area. A and drainage strategy would need to be provided, should the site be allocated, to consider what additional infrastructure would be needed to support development of the site. Further consultation with Thames Water will take place regarding the sites to be allocated through the DPD and any necessary improvements will be required through policy.

Drainage and flooding

- Water drainage issues associated with New Road Hill and the A4.
- Groundwater running down New Road Hill already causes an issue running across the A4 at times of heavy or prolonged rain.

- Increasing the number of houses on New Road Hill will no doubt increase the risk of flooding; water flows down the hill and then flows across the A4 eastwards increasing the risk to those houses south of the A4.

Council response:

The Environment Agency has not raised any concerns regarding flood risk in Woolhampton. Evidence provided during this consultation has indicated a surface water flood risk from New Road Hill, which will need to be considered before the site could be allocated for development.

It is recommended that all sites within Flood Zone 1 should carry out an assessment of localised flood risks, including surface water (flash) flooding. The cumulative impact of minor development, including development permitted without the need for a planning application, could also affect local flood storage capacity or flood flows.

Core Strategy policy CS16 (Flooding) requires all development sites to manage surface water in a sustainable manner through the implementation of Sustainable Drainage Methods. Due to the history of surface water flooding in the area, the Council would require the site promoter to provide a Flood Risk Assessment (FRA) for the development site and wider area. The requirement for this would be set out in any policy for the site.

6. Oil Pipeline

Consultation comments:

- There is an oil pipeline that runs along the northern part of this potential development site. This would significantly reduce the size of the land available for development and therefore potentially make it too small for allocation.

Council response:

The presence of the oil pipeline to the north of the site will require a buffer zone, which will impact on the design of the site. Should this site be chosen, the developer must consult with the Oil Pipeline Agency to establish the exact location of the oil pipeline in this area. There is still capacity to develop the site, with a design that takes into account the presence of the pipeline.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

WOOL006: Land to the North of the A4, Woolhampton

Responses received: 11

1. General

Consultation comments:

Some attempt to reduce ground vibrations, noise and air pollution for housing facing the A4 is made, either with a hedge or the planting of some trees.

- I would recommend that the new properties are built on preferred option WOOL001 as in my opinion that option would cause less disruption to fewer people and wildlife.
- Woolhampton has been identified as an area for future growth in the Core Strategy.
- Woolhampton has a number of facilities within the village.
- Settlement boundary is redrawn to include both sites and an expanded WOOL006.
- If only one site is to be chosen then WOOL006 is the most suitable, sustainable and logical site.
- Parish Council is in support of east west development of the site.
- More houses means more developer contributions.
- Allocate both WOOL001 and WOOL006.

Council response:

The Council's Environmental Health department will be given the opportunity to comment on issues such as pollution and ground vibration at the planning application stage, should this site be chosen.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Council is required to meet this requirement through what is known as a five year housing land supply. Without a five year housing land supply the Council can be vulnerable to planning by appeal, which could result in suitable developments coming forward. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the East Kennet Valley. East Kennet Valley spatial area has its own housing requirement to be delivered.

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development in the District. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the

criteria to be used to assess the settlement boundaries were consulted on as part of the preferred Settlement Boundary.

The consultation document has stated that only one site in Woolhampton will be chosen. It is considered that allocating both sites would be too much development during one plan period for a settlement the size of Woolhampton.

2. Environment / landscape

Consultation comments:

- An ecological survey of the site should be carried out.
- A wide buffer zone, to the west of the site, which could also act as a wildlife corridor, should be incorporated.
- Development is likely to have an impact on the character of the landscape.

Council response:

The Council's ecologist has been consulted on the site. There is potential for Great Crested Newts on the site, due to the location of two ponds to the north of the site. Therefore, an extended phase 1 habitat survey would be required, with additional surveys as necessary. The reorientated developable area of the site would leave a significant amount of open space some of which could be set aside for newts if necessary.

Core Strategy policy CS19 – Historic Environment and landscape Character, requires the diversity and local distinctiveness of the landscape character of the district is conserved and enhanced. This would need to be taken into account through the design of the site.

3. Design

Consultation comments:

- New houses facing the A4 should attempt to reproduce the period features of the other houses on the Bath Road in Woolhampton.
- Would recommend Georgian frontage onto the A4, in keeping with the Bath Road.
- Local residents have stated that they would prefer a linear development along the bottom of the red line site with the top of the site being left undeveloped.
- I would recommend that to avoid the pipe line and privacy issues there is a wide buffer zone to the western edge of the development incorporated into the design of the site.
- Option of using to the front of proposed plot WOOL006 extending further along the road toward the garage. This would avoid the issues with the pipeline and disrupting wildlife.
- WOOL006 is separated from existing houses, so hopefully will not have the impact described.
- Loss of privacy for existing properties.

- The development would not be well integrated with the village.
- Potential future development would include the remaining eastern half of the site. This would constitute an inappropriate scale of development for Woolhampton.
- Woolhampton can comfortably accommodate some additional housing across both of the identified sites and the maximum 30 additional units is modest.
- The site could be developed more comprehensively, which would contribute to the five year housing land supply and affordable housing
- Developable area should run west to east along A4 and not north to south.

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

The site promoter and Parish Council have indicated a preference for the southern part of the site to be developed along the A4, rather than the western part of the site. This orientation of the developable area of the site is supported by the Parish Council.

The site promoters have not suggested that they wish to develop the whole site. The extent of the site to be developed would be set out in any policy for the site and shown on the inset maps.

Should this site be allocated, existing residential privacy will be considered as part of any planning application.

Densities set out in the Preferred Options DPD are indicative and final densities for the sites, should the site be allocated, would be subject to discussion with the land owner.

Any future scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 and CS19 of the Core Strategy and the Quality Design SPD.

4. Highways and Transport

Consultation comments:

Highway network/traffic

- Additional housing along the eastbound A4 would give an apparent increase in the size of the village and may encourage drivers to stick to the 30MPH speed limit for longer.
- The road surface of the A4 is made free of tarmac joins, potholes, ridges, bumps, uneven drain covers, etc.
- The Highways Section was not consulted on this site.

Council response

Transport Assessment work has been carried out and indicates that the development of the sites will not have a significant impact on traffic levels. Where additional expert advice/reports have been produced these will be made available (if not already) as part of the next consultation in the autumn. Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider the local impact of the development, including access, and consider any necessary mitigation measures. A travel plan, promoting the use of alternative modes of travel to the car, would also be required.

Access to the site

Consultation comments:

- Road sight lines better than 01
- Access in and out of the proposed site should be safer than with Option 15.
- Traffic is stopped at the pedestrian crossing outside the Post Office allowing better flow of traffic in and out of any new development.
- Better access to the site would be gained by only developing the bottom of the site. This would leave the oil pipeline unaffected.

Council response:

Comments noted. Adequate access can be provided to the site. The site promoter has suggested the site should be orientated east/west along the A4 rather than north/south as suggested in the Preferred Options DPD. This approach is supported by the Parish Council.

Road safety

Consultation comments:

- The speed camera and National Speed Limit sign may require some readjustment.

Council response:

Comments noted. This would be dealt with at planning application stage.

Public transport

Consultation comments:

- Access to public transport is better from WOOL001.

Council response

Comments noted. However, there is still a good public transport service in Woolhampton. There is a railway station in Woolhampton (Midgham) and a regular bus (approx 30min) service along the A4 (Jet Black 1) linking Woolhampton to Newbury to the west and Reading to the east.

5. Oil Pipeline

Consultation comments:

- Oil pipeline will cause complications in terms of access and safety.
- Oil pipeline restricts the capacity of both WOOL001 and WOOL006.
- 10-15m buffer would be applied to any site design to take account of the oil pipeline.

Council response:

The presence of the oil pipeline to the north of the site will require a buffer zone, which will impact on the design of the site. The developer will need to consult with the Oil Pipeline Agency to establish the exact location of the pipeline in this area, prior to the submission of a planning application. The site promoter has suggested the developable area of the site is reorientated east/west to ensure there is no impact on the pipeline. The presence of the oil pipeline does not preclude the development of this site.

6. Sewerage

Consultation comments:

- It is deemed that the Pumping Station does not have the capacity to deal with any further additions from new housing.
- The site should have self-contained sewerage system, unless Thames Water has resolved the current sewerage issues in the village.

Council response

Thames Water has been consulted on the preferred options sites and has raised concerns regarding water supply capability and wastewater services in the area. A water supply and drainage strategy would need to be provided, should the site be allocated, to consider what additional infrastructure would be needed to support development of the site. This would be set out in any policy to guide the development of any allocated site.

The Environment Agency has stated that all new development should be connected to the mains sewer network to prevent potential pollution to water courses.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Woolhampton Rejected Sites

Responses received: 2

WOOL003: Land adjoining Woolhampton Allotments, Bath Road

Comments from the site promoter:

Flooding:

- WOOL003 did not flood in the recent bad conditions.

Council response:

The Environment Agency flood maps have designated this site as being in Flood Zone 3. The Environment Agency has advised that all sites within flood zone 3 should not be allocated for development. The Council have taken this advice and all sites in flood zone 3 have been automatically excluded as part of the site selection work.

The Environment Agency have said that the allocation of any site in flood zone 2 or 3 needs to be accompanied by a sequential test. The council are unable to carry out the sequential test as other suitable sites, outside these flood zones, are available.

Design:

- No visual impact due to level of road and existing hedgerow/tree.

Council response:

Comments noted.

General comments:

- This site is less prominent than the preferred options.
- If the whole site is not developable because of flooding the residue could be used for some form of public access.

Council response:

Comments noted. The site is not adjacent to the existing settlement boundary, and therefore, is less well related to the existing settlement than the preferred options sites.

WOOL004: Land at Bath Road, adjoin Watermill Court

Comments from the site promoter:

Flooding:

- The majority of this site did not flood in the recent bad conditions
- The flood rating is inaccurate.
- The development could be built using flood avoidance techniques

Council response:

The Environment Agency flood maps have designated this site as being in Flood Zone 3. The Environment Agency has advised that all sites within flood zone 3 should not be allocated for development. The Council have taken this advice and all sites in flood zone 3 have been automatically excluded as part of the site selection work.

The Environment Agency have said that the allocation of any site in flood zone 2 or 3 needs to be accompanied by a sequential test. The council are unable to carry out the sequential test as other suitable sites, outside these flood zones, are available.

General comments:

- This site is less prominent than the preferred options.
- It is well screened by existing woodland
- It adjoins the settlement boundary.
- It found favour with the Parish Council
- It has access to all the local facilities
- Parts of site that are not subject to flooding could be used for public access.

Council response:

Comments noted. However, it is worth reiterating the point that the site was ruled out due to its location within Flood Zone 3, see comment above.

The Parish Council comments make no reference to this site.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - AONB Spatial Area

Bradfield Southend General Comments

Responses received: 5

1. Principle of development

Consultation comments:

- Asserts that there is a need for further sites within the service villages of the AONB – the number of dwellings identified in the Housing Site Allocations (HSA) DPD falls short of residual requirement (which respondents have identified using 2013 AMR data).
- Support for the principle of an allocation of residential development in Bradfield Southend.

Council response:

The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution but seeks to allocate small scale housing sites to meet the requirement set out within the Core Strategy.

The Core Strategy identifies Bradfield Southend as a service village within the settlement hierarchy. This means that Bradfield Southend, along with the other service villages, has a limited range of services and has potential for some limited development. As such, it is expected that Bradfield Southend will accommodate some additional housing growth to 2026.

The level of development to be provided within each of the rural service centres will vary depending on the character and function of the settlement, along with the assessment of individual sites submitted for housing development.

The Core Strategy DPD sets out the housing requirement of up to 2000 new homes in the AONB over the plan period, but makes it clear that the provision of this scale of housing is subject to the overarching objective for the AONB to conserve and enhance its special landscape qualities.

Support for principle of an allocation for residential development in Bradfield Southend noted.

2. Infrastructure

Utilities

Consultation comments:

- Recommend that liaison with Thames Water takes place to ensure that the impact of new development and any upgrades that may be required to the sewer

network are understood, either through the production of a drainage strategy or the provision of a connection to the sewerage system at the nearest point of adequate capacity

Council response:

Comments noted. Further consultation with Thames Water has taken place as part of the Duty to Cooperate whereby they advised that the policy for each individual site allocated in the HSA DPD should ask for an integrated strategy for water and wastewater to be prepared to support a planning application. This suggestion has been taken forward in the DPD.

3. Settlement boundary

Consultation comments:

- Expand settlement boundary to reflect the reality of Bradfield Southend and allow for new houses and redevelopment.

Council response:

Comments noted. The HSA DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy, such as Bradfield Southend. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development.

Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation (July – September 2014).

A comprehensive review of all of the districts settlement boundaries will then take place as part of preparation on a new Local Plan which will commence once the HSA DPD is adopted in 2016.

4. SHLAA Process

Consultation comments:

- Queries why the settlements that scored the same as Bradfield Southend in 2010 (Stockcross and Upper Basildon) have been excluded from the Strategic Housing Land Availability Assessment (SHLAA) process.
- Changes to services and facilities in Bradfield Southend since 2010 should be considered as these affect the 2010 scoring – Bradfield Southend no longer matches the settlement hierarchy policy.
- Querying why the scoring for Bradfield Southend has not been adjusted as part of the SHLAA process.

Council response

The role of the HSA DPD is to implement the framework of the Core Strategy by allocating small scale housing sites to meet the overall housing requirement in accordance with the spatial strategy. It does not reassess the spatial strategy set out in the Core Strategy. Stockcross and Upper Basildon are not included with the settlement hierarchy and are therefore, housing allocations in these locations are not being considered.

The sites shortlisted as preferred options for allocation are based upon sites put forward to the Council for the SHLAA. The SHLAA is a technical document that informs the development plan process and provides background evidence on the possibility of available land in and around the settlements within the settlement hierarchy.

The number and distribution of dwellings to be provided over the District in the longer term will be addressed in a Local Plan, which will follow the adoption of the HSA DPD.

Changes to services and facilities within Bradfield Southend are noted. It is proposed to only allocate a small amount of residential development in Bradfield Southend.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

BRS004: Land off Stretton Close

Responses received: 16 responses

1. General

Consultation comments:

- Impact of development upon property prices.
- Loss of community.
- HSA DPD undertaken under pressure of time and in light of recent policy changes.

Council response:

The issues identified are not material considerations in the planning process. A material planning consideration is one which is relevant to making the planning decision in question, e.g. whether to grant planning permission or not. In general, material considerations are concerned with land use in the public interest, so the protection of purely private interests such as the impact of development on the value of a property or loss of private rights to light could not be material considerations.

Comments about the loss of community noted.

The Core Strategy DPD was examined during a time of transition in the planning process, and this led the Inspector to committing the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA) within three years of adoption of the Core Strategy. Waiting for the outcomes of a SHMA had the potential to delay the housing allocations process.

Progressing a Housing Site Allocations DPD is considered to be the most effective way in which to boost the supply of housing at the earliest opportunity in a genuinely plan-led manner, in accordance with the Core Planning Principles of the National Planning Policy Framework (paragraph 17) whilst undertaking a SHMA which will inform the District's longer term housing requirement.

2. Principle of development

Consultation comments:

- The proposal will not address the shortage of affordable rented or shared ownership housing.
- Housing should be close to employment, public transport and amenities.
- Comments made at the meeting with the Parish Council about other sites being unacceptable apply equally to BRS004. Illogical that BRS004 acceptable.
- Council under pressure to build 10,500 homes and decisions being considered which normally would not and should not be contemplated.

- Parish Council under pressure to nominate a site.
- Site selected because small and would prove path of least resistance. Other areas of district have fewer issues.
- Identified key issues in the SA/SEA site assessment lack detailed consideration.
- Within the 'relationship to/in combination effects...' sub section of the SA/SEA site assessment there are grammatical errors and it is incomprehensible.
- Most of neutrals and uncertain in the SA/SEA should be negatives. Mitigation measures identified within the SA/SEA just hide the problems with the site.
- It is not possible to grasp through the SA/SEA site commentary if only a section or all of the site is proposed for development.
- The 'justification' section in the SA/SEA site commentary ignores that a previous application was rejected in 1999 in addition to the recommendation in LCA that three smaller sites should be developed ignored.
- The comment in the 'site description' in the SA/SEA site commentary on visibility implies that those closest to the site are unimportant. Impact of humans and vehicular traffic ignored. Unacceptable to ignore poor facilities in village.

Council response:

Should the site be allocated and a planning application subsequently submitted, then provision of affordable housing would be required in line with Core Strategy policy CS6 (provision of affordable housing).

The HSA DPD follows on from the Core Strategy and does not reassess the housing number or distribution but seeks to allocate small scale housing sites to meet the requirement set out within the Core Strategy.

The Core Strategy identifies Bradfield Southend as a service village within a settlement hierarchy. This means that Bradfield Southend, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Bradfield Southend will accommodate some additional housing growth to 2026.

The level of development to be provided within each of the rural service centres will vary depending on the character and function of the settlement, along with the assessment of individual sites submitted for housing development.

Comments about the observations made by Bradfield Parish Council at the SHLAA consultation event noted. The purpose of the consultation event was to informally discuss the potential housing sites identified in the SHLAA and to gain further information on local issues, community aspirations and local preferences for the sites. The parish council was not under pressure to nominate a site.

The site selection process has been rigorous and the site assessment criteria, which have their basis in national and local policy, were developed to assess the suitability of their allocation in the DPD, and focus on all aspects of sustainability, i.e. economic, environmental, and social.

All sites were initially assessed against automatic exclusion factors, and this determined which sites should be ruled out or considered further. All sites not

automatically excluded were then assessed against a range of further considerations which looked in more detail at the suitability of sites for development, for example land use, contamination, accessibility and capacity of local services.

Early consultations were held with technical experts to inform the site selection process, e.g. Highways and Transport, Ecology, Environmental Health, Archaeology, Environment Agency and Thames Water, and in some cases their comments have shown that a site cannot be delivered.

All sites not automatically excluded were subject to SA/SEA which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites.

The site assessment is supplemented by a SA/SEA site commentary which provides a greater level of detail.

Grammatical errors in the comments made against the 'relationship to/in combination effects...' sub section of the SA/SEA site assessment are noted and amendments have now been made.

Reference to the 1999 application has been included within the SA/SEA site assessment in the 'Other' row.

Securing a good standard of amenity is one of the core planning principles of the National Planning Policy Framework (NPPF). Policy CS14 (Design Principles) of the Core Strategy requires that all development will be of a high quality and sustainable design that respects and enhances the character, appearance and landscape of the wider area. It also states that new development must make a positive contribution to the quality of life in West Berkshire. The Council's Quality Design Supplementary Planning Document provides guidance on the impacts of development on neighbouring living conditions.

The impact of development on neighbouring amenity is an issue that would need to be considered at the planning application stage, should the site be allocated and a planning application submitted.

The Infrastructure Delivery Plan of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

The site is not expected to generate a significant amount of traffic. The Council's Highways team has advised that due to the projected size of the development, the site would have a limited impact upon the highway. Nonetheless, any site allocated for development would be expected to provide a Transport Statement with a planning application and a Travel Plan to encourage the use of alternative modes of transport.

3. Consultation process

Consultation comments:

- Many people will be on holiday or busy with family over the summer period which makes it harder to give the necessary time to consider all elements relating to these proposals.

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

The Council was aware that the consultation would fall over the school summer holiday period and this was unavoidable due to the timeframe for the preparation of the DPD. The consultation period was extended from the usual six weeks so that it ran for seven weeks. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination. .

Public consultation on the preferred options stage of the DPD involved notifying all those registered on the consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case when consulting on major planning applications, letters were sent to properties located within a 100m radius of the proposed sites, and a press release was issued. The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the response to the

consultation was extensive with around 4,500 people making around 8,500 comments.

4. Design

Consultation comments:

- Impact on characteristics of Bradfield Southend – density and precedence for further development. Over development would result.
- Contrary to policy CS14 and several Government and West Berkshire Council policies, strategies and directives (which are not named in the response).
- Impact on residential amenity - privacy, noise, traffic.
- Scale of housing out of context to the size of Bradfield Southend.
- Harm to the character and amenity of the village.
- Village should remain small and peaceful. Development would change the characteristics of the village.

Council response:

As a service village, Bradfield Southend has been assessed, through the Core Strategy as suitable for a small amount of additional development. The densities set out in the preferred options document are indicative – the approach taken to identify the suggested housing number is the area of developable land and a suggested density. The suggested density has been based upon the character and size of the site, and the distance of the site boundary to a town/district centre. This provides a rough indication of the capacity of the site without taking constraints into account. The final densities for the site, should it be allocated, would be subject to more detailed work at the planning application stage and consideration of Core Strategy policy CS4 (Housing Type and Mix) which sets out density requirements.

Detailed design and site layout is a matter for the planning application stage. Development will need to take into account the character of the existing residential development, including density and design, and comply with Core Strategy policy CS19.

5. Ecology and trees

Consultation comments:

- Bats and owls in Tree Preservation Order (TPO) trees will not be protected.
- Development of site would be contrary to policy CS17 (biodiversity).
- Field supports range of wildlife including bats and is a BOA.
- Drainage of the springs on the site could impact on wildlife in the area.
- Within the site assessment of the SA/SEA there is disagreement that the site is not a 'Local Wildlife Site'. There are newts in area.
- Potential for Great Crested Newts.
- Environmental / ecological impact: respondent's garden which closely adjoins the site has supported bats, newts and snakes.

- Criteria based policy required for development on or affecting protected wildlife or geodiversity sites or landscaped areas.
- Distinctions should be made between the hierarchy of designated sites.
- Impact of development upon TPOs.
- Loss of valuable green space.

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options.

The Council's Ecologist has advised that an extended phase 1 habitat survey would be required to inform any future development of this site, together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected.

Local Wildlife Sites (LWS) are wildlife-rich sites selected for their local nature conservation value. Local partnerships, made up of a variety of stakeholders, oversee the selection of LWS' using robust, scientifically-determined criteria and local knowledge and understanding of the area's natural environment. The site has not been identified as a LWS.

The site falls within a Biodiversity Opportunity Area (BOA). BOAs are not a statutory designation or a constraint upon development; rather, they are areas where biodiversity improvements are likely to have the most beneficial results on a strategic scale. The Council will therefore pursue net gains for biodiversity in and around BOAs and projects which seek to enhance biodiversity within West Berkshire, particularly based on Biodiversity Opportunity Areas, will be supported.

Trees protected by Tree Preservation Orders (TPOs) can be removed, with prior approval from the Council. Usually permission is approved subject to alternative planting being provided on the site.

6. Economy

Consultation comments:

- No suitable local employment.

Council response:

The HSA DPD allocates sites in accordance with the spatial strategy set out the Core Strategy DPD. The main focus will be the urban areas of the district – Newbury, Thatcham and the east – whereby infrastructure and facilities (e.g. employment) exist to support sustainable growth. However, villages identified within the settlement hierarchies as service villages, such as Bradfield Southend, will benefit from small-scale development to meet local needs. The level of growth will depend upon the role and function they perform for the surrounding spatial area, and will be related to

their size, range of facilities and services. It is for this reason that only one small site has been shortlisted for allocation within Bradfield Southend.

7. Flood risk

Consultation comments:

- Standing water and flood risk on site.
- Site prone to surface water flooding and has flooded over the last two winters (2012 and 2013).
- Site adjoins an area of surface water flood risk.
- Why is the site a preferred option when surface water flood risk marked as unknown in the SA/SEA site assessment? A respondent has submitted photos of flooding on site and claims that it floods every winter.
- No accompanying comment alongside 'critical drainage area' other than letter 'A' in the SA/SEA site assessment. Designation therefore incomprehensible.
- In respect of the 'flood risk' sub-section of the SA/SEA site commentary, it is irresponsible to consider development in this area given evidence of flooding.

Council Response:

The site falls within Flood Zone 1 whereby the risk of flooding to the site is low.

The site does not fall within an area identified as being susceptible to surface water flooding. The unknown marking in the SA/SEA was made in error, and this has now been amended.

The Council's Principal Engineer has advised that he has no evidence of flooding on the site and that the standing water on the site does not preclude against the development of the site. A Flood Risk Assessment would be required with the submission of any planning application. This FRA would inform sustainable drainage systems (SUDs) as these will be required as part of any development that takes place in line with Core Strategy policy CS16 (Flooding).

The 'A' against the 'critical drainage area' criteria in the SA/SEA site assessment reflects that the site is adjacent to a critical drainage area.

8. Highways and transport

Consultation comments:

- Existing roads could not cope with an increase in traffic, e.g. Union Hill.
- Reliance on commuting/private car due to lack of suitable local employment.
- Development would be contrary to the Local Transport Plan.
- Within the 'highway network suitability' section of the SA/SEA site assessment, the comment is based on the notion that highway excluded Stretton Close.

Council response:

The site is not expected to generate a significant amount of traffic. The Council's Highways team has advised that due to the projected size of the development, the site would have a limited impact upon the highway (between 10-12 dwellings would generate circa 72 daily traffic movements including circa 20 during the 8:00 to 9:00 AM peak). Nonetheless, any site allocated for development would be expected to provide a Transport Statement with a planning application and a Travel Plan to encourage the use of alternative modes of transport.

Core Strategy policy ADPP5 (North Wessex Downs AONB) considers accessibility and highlights that opportunities will be sought to improve the accessibility to and within the AONB, bringing improved public transport links and the retention of services and facilities as well as stronger signage to enhance the identity of the North Wessex Downs.

Core Strategy policy CS13 requires that improvements should be made to travel choice and facilitate sustainable travel. A travel plan, promoting the use of alternatives modes of travel to the car, would be required alongside any planning application.

Access

Consultation comments:

- Access from Stretton Close inappropriate – alternative access should be sought from Southend Road.
- Within the 'access issues' section of the SA/SEA site assessment, concern about sight lines is mentioned. The highways team should now have an opinion on this – what is it?
- Within the SA/SEA, 'Preferred access from Stretton Close' suggests alternative access. Where is it?

Council response:

The Council's Highways and Transport team has advised that the sight lines at Stretton Close are well within standard, and they have not advised that access from Stretton Close is inappropriate.

The comments regarding an alternative access were made in respect of BRS003 coming forward with BRS004, and such an alternative access would have been from BRS003. The SA/SEA has been amended to clarify there is no alternative access to BRS004.

Public transport

Consultation comments:

- Limited public transport and there is no service available for commuters.

- In the SA/SEA, the one positive score, which relates to healthy, active lifestyles, is inaccurate – the poor bus service and rural location does not encourage walking and cycling.

Council response:

Development could provide an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Road Safety

Consultation comments:

- Roads and footpaths in village are narrow or non-existent.
- Stretton Close too narrow and site lines limited at Stretton Close and Southend Road junction.
- Poor road quality – accidents have recently occurred at the junction of Southend Road and Hungerford Lane.

Council response:

All development will be required to show at the planning application stage how it promotes healthy and safer travel.

Walking

Consultation comments:

- Legal right of way on title deeds for access to the side of 9 Stretton Close. Development would compromise this and any request to vary these rights would be denied.

Council response:

The site promoter owns the strip of land for access via Stretton Close.

9. Infrastructure

Consultation comments:

- Infrastructure capacity limited at present. Development would increase pressures on these services.
- Need for extensive infrastructure (i.e. sewage plant). Once infrastructure in place, additional development could take place.
- Only one village shop which is viable.
- Pub unlikely to continue.
- Village hall in poor state of repair.
- Proposal for existing church to close with replacement built subject to funding.

- The SA/SEA site assessment omits the parish council's criticisms of village facilities and infrastructure.

Council response:

The Infrastructure Delivery Plan of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

Comments about the viability of the pub, the state of the village hall, and the proposal for the church are noted.

The SA/SEA has been updated to reflect the parish council's concerns around village facilities and infrastructure.

Education

Consultation comments:

- Primary school at capacity. Development would increase pressure.
- Upgrade to the school required.
- School in special measures.
- Limited secondary choice.
- The comments made against the 'education' sub-section of the SA/SEA site commentary comments ignore performance of school (poor Ofsted).

Council response:

The Council's Education team has advised that the primary school is likely to have some capacity due to the current situation and have not raised any concerns about pupils from this site being accommodated.

The shortlisted site falls within the catchment of Theale Green Community School which has capacity.

The performance of schools is not a matter of consideration for the DPD.

Healthcare

- Recent closure of GP surgery.

Council response:

The Council recognises that additional development in the area would add pressure on the current GP services.

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan.

Utility services

Consultation comments:

- Thames Water concerns over water supply to new development.
- Within the 'water supply' section of the SA/SEA site assessment, the concerns of Thames Water ignored.
- The 'EA & Thames Water' sub-section of the SA/SEA is unclear exactly what water supply issues are, and how and when they will be addressed. This should have been considered before not after recommendation made.
- No mains gas supply in Bradfield Southend.
- Disruption to electricity supply due to long distance overland power lines that pass through wooded areas.
- Mobile phone coverage in the area is poor.
- No high speed broadband connections available.

Council response:

Initial consultation with Thames Water indicated significant concern regarding water supply capability, in particular water resource capability. They also advised of known issues with the Harts Hill Booster Station. Following further discussion with Thames Water, it was agreed that the way forward would be that the policy for the sites will ask that an integrated strategy for water and wastewater is prepared to support a planning application and that this should cover flood risk, water quality and conservation.

The site assessment forms part of the site selection process, so issues flagged in the site assessment are then discussed in further detail in the summary and recommendation.

Comments about the gas and electricity supply, phone coverage and high speed broadband connections noted. Any redevelopment of the site would be subject to the CIL. Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

10. Landscape/setting

Consultation comments:

- Land forms a vital part of the AONB due to wildlife supported on the site.
- Full Landscape and Visual Assessment (LVIA) on the proposed levels of development required if site allocated with justification for why extra development is required in the AONB.
- Study submitted by local residents in response to the Landscape Capacity Assessment (LCA) which argues that the annual cycle of vegetation and screening for the residents of Stanbrook Close or the viewpoints from existing dwellings in general. It also asserts that the report does not take into account the site is very susceptible to flooding.
- Detailed assessment from LCA not included within the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) site assessment. Without this, the conclusion is meaningless.
- The 'located in AONB' section of the SA/SEA site assessment makes reference to pavements. This makes no sense. No regard to AONB appears to have been given in selecting the site as preferred option.
- The SA/SEA states that development would result in the loss of significant tree belts, including Tree Preservation Orders (TPOs). This is inconsistent with the SHLAA achievability section which notes that the area proposed for development takes into account TPOs and landscape buffer. The LCA concludes development could be located adjacent the settlement edge but maintaining the woodland group – the authors of the LCA have no idea of capacity of site.
- With regard to the 'landscape' sub-section of the SA/SEA site commentary, disagreement that development of site would not be unlikely to compromise AONB. Mitigation vague. Will TPOs be maintained?

Council response:

All development will be of a high quality and sustainable design that respects and enhances the character, appearance and landscape of the wider area. This is a requirement of the policies within the Council's Core Strategy.

The site is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Protection of the AONB is paramount, and where a site was considered to cause harm to the AONB it was not included within the Housing Site Allocations Development Plan Document Preferred Options. All sites within or adjacent to the AONB have had a Landscape Capacity Assessment (LCA) carried out. The LCA considered topography, visual prominence and the setting of the sites.

The assessment has indicated that development could be accommodated on the site subject to certain mitigation measures to reduce the potential impact on the AONB. These include the retention and enhancement of the existing tree belt and woodland group in the northern corner, linking to new tree planting to the west and north; access via Stretton Close; and the submission of a full detailed landscape and visual assessment alongside any planning application for the site should it be allocated to inform the final capacity of the site.

The Council's landscape consultant has reviewed the study submitted by local residents in response to the LCA, and advises that the strategic nature of the study meant that general observations on visibility were made, focusing on public viewpoints within the AONB rather than private viewpoints. Where housing sites adjacent to existing settlements are being considered it is assumed that views from adjacent properties are likely to be affected.

The report recommends that a full detailed landscape and visual impact assessment will be required to inform the final capacity of the site. However it would not normally be practical to take photographs from individual dwellings, though an assessment would be made by looking in detail from the site towards houses likely to be affected.

The 2014 report does acknowledge that the southern boundary (with Stretton Close) is open. In residents' photo 4 the on-site vegetation shown does provide some screening even in winter, though sections of the boundary are open all year.

The description of the site states that there is little intervisibility within the village, except with houses immediately adjacent to the site and that there will be some loss of visual and aural tranquility.

The reference to pavements was included in error and has now been removed from the site assessment.

The SHLAA considers the principle of development and measurements of the developable area are approximate. More detailed site assessment then took place to inform which sites should be shortlisted for allocation in addition to the developable areas of these sites. As aforementioned, all sites within the AONB were subject to a Landscape Capacity Assessment. In the case of BRS004, this has informed the developable area of the site.

The majority of the TPOs fall outside of the developable area of the site. Trees protected by TPOs can be removed, with prior approval from the Council; usually permission is approved subject to alternative planting being provided on the site. Detailed design and site layout is a matter for the planning application stage, and it is at this stage that it would be ascertained if the TPOs within the developable area of the site would be maintained.

11. Pollution

Consultation comments:

- Development would create unacceptable level of noise and pollution for existing residents.

Council response:

It is unlikely that development of the site will have a significant impact on noise or air quality pollution.

All development proposals will be expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 (Sustainable Construction and Energy Efficiency) of the Core Strategy DPD.

Likewise, all development proposals will need to have regard to Saved Local Plan policies OVS.5 (Environmental Nuisance and Pollution Control) and OVS.6 (Noise Pollution).

Support for the allocation of the site from the site promoter noted.

12. Strategic Housing Land Availability Assessment (SHLAA):

Consultation comments:

- No indication of location and size of landscape buffer in Housing Site Allocations DPD despite achievability section of SHLAA noting that area proposed for development takes into account TPOs and landscape buffer. Cannot understand what is proposed.

Council response:

The SHLAA considers the principle of development and measurements of the developable area are approximate. More detailed site assessment then took place to inform which sites should be shortlisted for allocation in addition to the developable areas of these sites.

13. Comments from the site promoter

West Build Homes consider that the number of dwellings allocated for Bradfield Southend is appropriate to its size and proximity to local services and facilities in accordance with Paragraph 14 of the National Planning Policy Framework requiring a presumption in favour of sustainable development.

West Build Homes consider that the proposed allocation is the most appropriate site for development in Bradfield Southend.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Bradfield Southend Rejected Sites

Responses have been received from the site promoters of four of the sites not taken forward for allocation.

BRS001: Land to the south east of South End Road

Consultation comments:

- Reasons for the rejection of BRS001 are disputed (relationship of the site to the settlement boundary, assumption that whole site would be developed) and can be overcome by allocating only a proportion of the land that has been made available.
- The large extent of land available provides additional flexibility enabling the delivery of the site.

Council response:

The LCA advises that development on this site would not comply with the National Planning Policy Framework (NPPF) as development 'would result in harm to the natural beauty and special qualities of the AONB'. The study recommends that development 'should not be pursued further as a potential housing site on landscape grounds'.

BRS003: Land to the north of South End Road and BRS005: Land at Crackwillow, Cock Lane

Consultation comments:

- BRS003, BRS004 and BRS005 should be developed in a comprehensive way as suggested in the 1999 Inspector's Report into the Local Plan. The Council's concerns about this approach (scale and loss of linear approach) can be addressed by reducing the site areas. This would result in the linear form of the village being maintained.
- Recommendations of the Landscape Capacity Assessment (LCA) and the selection of BRS004 as the preferred option are inconsistent.
- The Landscape Capacity Assessment recommends development of BRS003, BRS004 and BRS005 options.
- Three potential accesses available to the reduced sites areas.

Council response:

The LCA states that BRS004 would be the preferred option for the settlement in landscape terms and BRS003 would be unacceptable if BRS004 were not developed. Only the eastern part of BRS005 would be acceptable due to landscape, visual and settlement pattern constraints and is the least preferred option.

As aforementioned, only a limited amount of development is required within Bradfield Southend due to its designation as a service village within the settlement hierarchy. In light of the findings of the LCA, only site BRS004 is being taken forward as an allocation in the HSA DPD.

Comments about the accesses available to the reduced site areas noted. It is at the planning application stage that specific access points would be determined through a Transport Assessment.

BRS005: Land at Crackwillow, Cock Lane

Consultation comments:

- Refutes reasons for rejection of BRS005 (number of dwellings, surface water flood risk, ground levels).
- Site promoted for 24 dwellings.
- Shortage of housing in the area – need for site to come forward.
- Future housing requirement likely to increase – site could help meet any future requirements.
- North west corner of field boggy in winter. Land can be drained to accommodate buildings and foundations would be deeper than normal. Slopes and drainage sufficient to take away excess water that would constitute flood risk.
- Site enclosed on two sides.
- 1/3 of field on same level as BRS004. Final third has gentle slope, is adjacent to existing housing and has good drainage and is dry.
- Opportunity to provide access from Cock Lane via enlargement of the entrance developed for the school. Advised by property developer that this would be acceptable. Access could also serve BRS004 and BRS005.
- An assessment undertaken when permission given for the school 22 years ago highlighted that Cock Lane underutilised. No traffic incidents reported in last 22 years despite 100 traffic movements per day.
- Development of the site would not extend the village envelope.
- Two development opportunities on the site – (1) development of the whole site with access from Cock Lane and Stretton Close; (2) land to the south of site which is adjacent BRS004 (BRS004 owned by the site promoter's son and daughter-in-law).

Council response:

Housing numbers and densities set out in the Preferred Options DPD are indicative. These issues, should the site be allocated, would be subject to discussion with the land owner and more detailed work at the planning application stage.

The Preferred Options DPD provided a range of options for development in Bradfield Southend, from which the most suitable would be chosen following the consultation. It is not the intention of the council to allocate all the sites put forward in Bradfield Southend as preferred options.

Within the settlement hierarchy, Bradfield Southend is classified as a service village. Due to the small amount of facilities within these villages, only a limited amount of development is required.

The physical attributes of the site and location of surrounding development are noted.

Specific access points would be determined through a Transport Assessment, which would accompany any planning application.

Any historical evidence concerning traffic levels would need to be updated and submitted with a Transport Assessment to support a planning application, should this site be allocated.

As the development site is located outside the settlement boundary then it is considered that the village envelope would be extended via a review of the settlement boundary. The Core Strategy makes it clear that in order to meet the Council's housing requirement, development on greenfield sites on the edge of settlements is necessary, therefore the Housing Site Allocations DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy.

The different development options are noted.

BRS006: Land at Ash Grove

Consultation comments:

New site put forward which is located along the northern boundary of Bradfield Southend and abuts Ash Grove and Bradfield Primary School. Respondent considers site to be suitable, deliverable and available immediately.

Council response:

The Preferred Options DPD provided a range of options for development in Bradfield Southend, from which the most suitable would be chosen following the consultation. It is not the intention of the council to allocate all the sites put forward in Bradfield Southend as preferred options.

Within the settlement hierarchy, Bradfield Southend is classified as a service village. Due to the limited amount of facilities within these villages, only a limited amount of development is required.

The LCA advises that 'Development on the whole of this site would result in harm to the natural beauty and special qualities of the AONB. However, the south eastern part of the site, adjacent to the settlement edge could be developed without harm to the natural beauty and special qualities of the AONB'. Should the site be allocated, a full detailed landscape and visual impact assessment would be required to inform the final capacity of the site. The SA/SEA explains why this site has not been selected for allocation.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Chieveley General Comments

Responses received: 2

Consultation comments:

- In favour of less development than seen in Chieveley through the previous Local Plan
- No evidence of significant local need for additional housing
- Impact on traffic/speeding
- Impact on views
- Impact on the AONB
- Need to preserve important open space
- Improve public transport
- Good landscaping
- Improving rights of way
- Capacity of school, doctors utilities and infrastructure are a concern, especially with additional population
- Acceptance of development of sites within the settlement boundary – CHI002, 019, 020
- The parish council previously objected to development on CHI002 (Bardown) on landscape grounds. However, it is acknowledged that all or part of the site is PDL and remains in accordance with the local plan and may come forward in the longer term
- Sites in Oare are considered countryside and should not be developed and Oare should not be given a settlement boundary
- Parish Council have carried out a survey regarding need for further housing to support services/infrastructure – stated that none reported a requirement for more houses to maintain services/facilities. Retail opportunities were not against additional development, but did not consider it a requirement to continue trading.
- Environment Agency – recommend sites have a connection to the mains sewer – see details in their response

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026 and the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the AONB would be able to take the amount of development proposed. Chieveley is designated as a service village

within the Core Strategy, and therefore is expected to take some degree of development over the plan period.

As a settlement within the AONB, Landscape Assessment work has been carried out on all sites around the village. Sites which are assessed as having a significant impact on the AONB have not been taken forward. Where sites are considered suitable for development, this is often accompanied by a reduced site area and a detailed list of mitigation measures that would be required. Sensitive site design will be critical to the delivery of the site.

All development is required to provide a degree of open space.

Improvements to the Rights of Way network are dealt with by the Rights of Way Improvement Plan.

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

For sites within the settlement boundary, there is a presumption in favour of development, meaning these sites do not need to be allocated.

It is not proposed to allocate the sites in Oare. Oare is not within the settlement hierarchy, and therefore the allocation of development here would not in accordance with the Core Strategy.

The results of the Parish Council survey are noted.

The requirement for all sites to connect to the mains sewer system is noted and the requirement will be included within the site specific policy.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

CHI010: Land adjacent to Coombe Cottage, High Street

Responses received: 10

1. Principle of development

Consultation comments:

- The village has seen significant growth in recent years
- Is there a need for housing in Chieveley? With thriving businesses and school at capacity we don't think so
- How is the local need assessed?
- Part of the site is within the conservation area
- Infill development was previously discouraged
- An appeal decision at Ossian (Chiltern House) to expand the nursery was dismissed on highways impact

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026 and the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the AONB would be able to take the amount of development proposed. Chieveley is designated as a service village within the Core Strategy. The Core Strategy states that *"Service Villages have a limited range of services and can accommodate more limited development... These villages would benefit from small-scale development, appropriate to the character and function of the village, in order to meet local needs, including residential infill or minor development adjacent to the settlement"*.

Future, longer term need has been established through a recently completed Strategic Housing Market Assessment (SHMA), which determines the Council's up to date objectively assessed housing need. This has been done in partnership with the other Berkshire Local Authorities to take into account the Housing Market Areas.

It is noted that the site is within the conservation area, when the site assessment forms stated the site was adjacent to it. This has been corrected. The impact on the conservation area would be dealt with at detailed design stage, through a planning application. Sensitive design would be required to take into account the existing character of the area.

Planning applications are dealt with on their merits, the allocation of sites considers the principle of development on a site, with details to be discussed at planning application stage. Consultation with the Council Highways Development control team has not raised any concerns regarding the highways impact of this site.

Alternative sites

Consultation responses:

- Other more appropriate sites have not been adequately considered – CHI015 (land at School Lane) – has local support, close to services/facilities, does not impact on other dwellings, could benefit the school parking
- At the parish council consultation event this site was rejected by most residents, the preferred sites could accommodate more dwellings than this site

Council response:

Given the location of Chieveley in the AONB, the impact on the landscape is a key factor in deciding whether a site is suitable for development. CHI015 has been assessed and the conclusion drawn that development on the site would cause harm to the AONB.

Very few sites in Chieveley have been assessed as being suitable in landscape terms for development. The Council are only able to consider sites which have been assessed as suitable for development. Of all the sites promoted around Chieveley for more than 5 dwellings, this is the only site considered suitable in landscape terms.

Development potential

Consultation responses:

- Development at 20 dwellings per hectare would be out of keeping with adjacent residential areas. May need to be reduced. A sympathetic approach to village development should be adopted
- Suggest a maximum of 4 dwellings would be more appropriate
- Difficult to understand why this site is being included given the approach to sites with 5 or fewer dwellings
- 2/3 houses may not make a big difference

Council response:

Standard densities have been used to calculate the development potential on all sites for the purposes of the Housing Site Allocations Preferred Options DPD. The final density of the site will be subject to negotiation with the site promoter and would need to be in keeping with the character of the adjacent residential areas. It is noted that a lower density on this site may be more appropriate.

Sites under 5 dwellings have been considered as part of the settlement boundary review process as these sites are too small to allocate. It may therefore be that this site is considered as part of the settlement boundary review rather than for allocation as a result of consultation.

2. Ecology

Consultation comments:

- Impact on local wildlife

Council response:

All sites have been reviewed by the Council's ecologist. No specific concerns were raised regarding the site, although an Extended Phase 1 Habitat Survey would be required.

3. Employment

Consultation comments:

- Impact on Bed and Breakfast business – overlooking/loss of peace and quiet location.
- Dwellings would need to be south facing, with no windows to the west and level with the Bed and Breakfast to prevent invasion of privacy – would only allow 2/3 dwellings

Council response:

The layout of the site is a detailed design matter and would be considered at planning application stage. There is guidance relating to loss of light and overlooking which would be considered as part of any planning application.

4. Flood risk

Consultation comments:

- Flooding of High Street during periods of heavy rain, inc. sewage flooding

- Surface water drainage capacity

Council response:

Thames Water has been consulted on the site, and has not raised any concerns regarding waste water discharge.

Part of the site is within a surface water flood risk area, Sustainable Drainage Systems (SUDs) would be required on the site to manage surface water.

5. Highways and transport

Traffic and congestion

Consultation comments:

- Increased traffic
- Speeding through the village is an issue
- Traffic on the lane would go from 2-3 a day to nearly 20
- The High Street is used as a rat run
- High Street is very busy at peak times – difficulties entering/exiting driveways
- Adding more cars seems irresponsible to existing residents who have invested in the village

Access

Consultation comments:

- Access track is unsuitable. New access would need to be provided providing adequate sight lines, moving it towards the recreation ground.
- Access is opposite Quackers Day Nursery
- Driveway opposite, could lead to inconvenience of headlights from oncoming cars
- Site is at a pinch point on the High Street

Road Safety

Consultation comments:

- Road safety implications on the High Street, from additional traffic and for pedestrians walking along the road near to the proposed access
- There is no street lighting along High Street

Parking

Consultation comments:

- On Street parking particularly associated with Quackers Day Nursery

Walking and cycling

Consultation comments:

- Issues of inconsiderate parking on the High Street cause issues for pedestrians, especially if pushing a buggy
- The pavement outside is a key walking route for many within the village – which should be encouraged where possible

Council response:

The size of the site is not considered to have an impact on the local highway network.

The Council's Highways Development Control team have reviewed all the sites, and have not raised any concerns regarding access. If more than 6 dwellings are to be provided on the site the access would need to be designed as an adoptable highway. The site capacity has been reduced to take this into account.

Detailed consideration of access and the impact on the local highway network and Road Safety would be considered at planning application stage.

On street parking associated with Quackers Day Nursery would need to be dealt with directly by the nursery. There could be potential to encourage parents/visitors to use the village hall car park which is close to the nursery, but this would have to be done through agreement with the Parish Council.

6. Infrastructure

Consultation comments:

- Close to the recreation centre with very good facilities
- Infrastructure is stretched and showing signs of not coping. It will be pushed to its limits

Council response:

The proximity to the recreation centre has been noted in the site assessment forms.

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Medical services/doctors

Consultation comments:

- There are 3 sites in the DPD that will increase the number of patients at Downland GP Practice by around 400
- The Chieveley building is near capacity however the Compton building has potential to expand but would require refurbishment to make them fit for additional use.
- Options for Compton building are 1) refurbish, 2) rebuild, or 3) new building on DPD site
- Downland practice will have capacity to have additional patients from the developments in the area if it receives the funding to support this.

Council response:

The requirements for additional medical services/facilities will be picked up through the IDP and service providers will be invited to be involved in determining what infrastructure is required.

Education

Consultation comments:

- Chieveley primary school acts as overflow for Hermitage and Curridge schools and is now almost at capacity itself
- The school entry boom starts about 5 years after new houses are built and continues for some time afterwards

Council response:

The Local Education Authority has not raised any concerns with this level of development taking place in Chieveley.

Utilities

Consultation comments:

- Adequacy of water services (inc. drainage)
- Sewage system capacity
- The village is subject to regular power cuts

Council response:

Consultation has taken place with Thames Water. They have not raised any concern regarding the proposed level of development in Chieveley.

Consultation has taken place with National Grid; however, no concerns have been raised regarding power supplies in the area.

7. Landscape/setting

Consultation comments:

- Most people move to Chieveley for the rural, peaceful and quiet location with good facilities and access to major roads. Hoping that the AONB and Settlement Boundary would provide some protection against infilling
- Landscape Assessment does not appear to take into account views from countryside to the north and east
- Landscape Assessment only considers the impact from the north and east, no consideration of the impact from south and west – do local residents not have the same considerations when it comes to AONB protection
- Site is partly in the conservation area, so Sustainability Appraisal/Strategic Environmental Assessment should be neutral not positive on this point

- Consideration should be given to the existing and directly affected residents – impact on their views and experience of the AONB
- Understand the impact on the AONB is not considered to be an issue here
- The site does not appear to take into account that there are 2 pieces of land separated by 2 discrete unrelated dwellings

Council response:

All sites in the AONB have been subject to a landscape assessment. Where the landscape assessment indicates that development will have a significant impact on the character and special qualities of the AONB the site has not been recommended for development.

The Council's landscape assessment states that development on this site, subject to certain mitigation measures, would be acceptable. The assessment considered the impact of development on the AONB from the site looking out and from the AONB looking in.

Sensitive design would be required to ensure that any development on the site is in keeping with the character of the area. Details would be discussed at planning application stage regarding the potential impact on the conservation area.

Certain impacts on neighbouring properties are considered at planning application stage as they are related to detailed design.

Site layout will be considered at planning application stage.

8. Personal

Consultation comments:

- Invasion of privacy
- Screening would block late afternoon/evening sun from people's gardens

Council response:

Development would need to take into account the privacy of neighbouring properties. This is a design detail that would be discussed at planning application stage.

9. Settlement boundary

Consultation responses:

- Partially within the settlement boundary – which would need to be reviewed

- Based on settlement boundary guidelines the site should not be included in the recommendation
- Tampering settlement boundaries could set a precedent – what would stop other sites being developed outside settlement boundaries?

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Chieveley Rejected Sites

CHI001: The Colt House, Green Lane

Responses received: 1

Consultation comments:

- The site should be rejected
- Development would change the character of the area
- Disagree that the site should be considered as part of the settlement boundary review
- In the Parish Council survey the site had the lowest ‘include’ response of all sites, and third highest ‘do not include’ response. The site had the highest ‘possibly include’ response but none of these responses were clarified with additional comments
- Parish Council does not see any need for a radical change to the settlement boundary criteria
 - Inc. the first 2 criteria (on close knit physical character and dispersed or ribbon development), criterion 7 (open undeveloped parcels on the edge of settlements) and excluding from the boundaries areas of scattered and loose-knit development – therefore, the site should not be within the settlement boundary
- The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) states that development of the site (for 5 houses) would be out of keeping with the character of the area
- The SA/SEA does not take into account the cumulative effects of including this and CHI017 in the settlement boundary – impact on character of area, traffic on a narrow lane, landscape character
- Capacity has been assessed as 5 dwellings, in other places 5 dwelling sites have been put forward for allocation – this approach is inconsistent. Allocation of the site ‘by the back door’ should not be considered
- CHI001 and CHI017 would be considered together, which could result in the development of 10 dwellings, which would be out of keeping with existing development in the area and has already been rejected in the SA/SEA

CHI015: Land at School Lane

Responses received: 2

Consultation comments:

- In the Parish Council's consultation this site had the highest number of 'include' responses
 - Comments all made the same points
 - Helps school with security and parking
 - Development is a good idea with facilities for car park and school drop off
 - Only if parking/drop off area for school included
- The Parish Council expressed the view that further consideration of the site would be worthwhile, subject to landscape and traffic assessments, and should only be included if the benefits of the school drop off are a) supported by the school, b) deliverable through the allocation of the site being accompanied by a S106 agreement
- The Parish Council note the outcome of the landscape assessment

Council response:

The Council recognise that this site is considered favourably by some members of the local community as it proposes to provide car parking facilities for the school and that the Parish Council considered that the site should be subject to further consideration. Further technical work has been carried out on the site, with the Landscape Character Assessment stating that development on the site would not be appropriate. This outcome has been noted by the Parish Council.

The Council does not generally support the provision of school car parks specifically for parents as this undermines the duty placed on the Council by the Education and Inspections Act 2006 to promote sustainable modes of travel to school. The Council work with schools to promote walking and cycling to school through School Travel Plans. Following redevelopment work at the school, a designated drop off area was created to improve road safety, and a travel plan was also produced. The Travel Plan does not appear to be actively promoted at the current time, and therefore, before additional parking was considered to be appropriate by the Council, the Council will work with the school to promote and encourage more children to walk or cycle to school.

Comments from the site promoter

Principle of development

- National Planning Policy Framework (NPPF) paragraph 14 applies a presumption in favour of sustainable development and sets out that the benefits of a development must be weighed in balance in reaching a decision
- No account has been taken of the wider benefits of the site – which includes provision of a car park for use by the school to alleviate highway safety and congestion
- This is recognised by the Parish Council (see parish council comments above)
- In a similar way to the assessment of Bardown in 2006 there are significant planning benefits to be achieved through development of this site including school car parking/drop off area and provision of affordable housing and S106 contributions to support the local community
- The community felt quite positively about the site if it could deliver parking for the school
- The site should at least be included as a reserve site given the community benefits

Council response:

The Council does not consider the proposed benefits of the site, through provision of a school car park, to be an appropriate reason to outweigh landscape concerns. The starting point for any development proposed for the AONB is the impact on the landscape, which is nationally protected. Additionally, the Council does not generally support the provision of car parking at schools specifically for parents. The Council works with schools to promote walking and cycling through Travel Planning, which in turn reduces the number of parents driving to school improving the road safety outside the school.

The Parish Council recognised that further consideration of the site should be carried out, but notes that the landscape assessment has shown that the site is not suitable for development.

A planning application was received for this site, and refused, many of the points covered in the consultation response have been dealt with by the planning application.

General housing provision in Chieveley

- Unable to rely on Bardown as planning permission has lapsed
- Parish Council consultation feedback indicated the community felt approximately 50 dwellings would be all the village needed, with the Parish Council statement

stating there was no evidence that development on a greater scale than about 75 was needed to meet local needs

- A second site in Chieveley was only removed from the draft DPD at the last minute as it became unavailable. The DPD does not go as far as analysing what the development needs are for the village, nor does it put a number on total housing allocation for Chieveley, indicating the Council had accepted the village could accommodate up to 35 dwellings
- The DPD therefore, does not seek to allocate sufficient sites in Chieveley to meet local needs. This could stall sustainable growth of the community
- DPD is based on an out of date housing requirement that is not an OAN
- Has not been prepared with the benefit of a clear understanding of housing needs in the district
- Does not boost supply of housing in the district
- Does not seek to allocate sufficient sites in Chieveley to meet local needs

Council response:

The Council is not relying on Bardown. The planning permission has lapsed, and the site has been removed from the Council's housing land supply. The site has been returned to grassland, and could now be considered Greenfield.

The Council are only able to consider sites that are available and promoted through the Strategic Housing Land Availability Assessment (SHLAA). A number of sites were considered as potentially developable, and further assessed through the site selection process. Technical evidence, or site availability can mean that a site once considered appropriate for development is not longer considered suitable.

The Core Strategy sets out a number of houses to be delivered across the spatial area, it does not set out specific requirements for each village, therefore, there is flexibility for the amount of development to be allocated within each of the villages in the settlement hierarchy. The DPD is looking to positively boost supply and introduce a degree of flexibility over and above the Core Strategy housing requirement, to take account of the new housing figure set out in the Council's Strategic Housing Market Assessment (SHMA). The Council recognises that the housing requirement within the Core Strategy is not based on an Objectively Assessed Need; however, this will be addressed through a new Local Plan which will follow on from the adoption of the Housing Site Allocations DPD.

Landscape

- The site has been discounted as a result of the Council's Landscape Assessment
- No assessment has been carried out for CHI007 or CHI010, which would suggest the site was still considered developable until recently

- The site was only viewed from 2 locations – one from the right of way adjacent to Ogdow House to the west of the site, and one immediately to the front of the site.
- Expansive views to the west are considered to be private views only gained from entering the site or from a small gap in the hedgerow on the far north-west of the site. It is unlikely these views would be seen by members of the public
- The site is distinctly different in character from the rolling agricultural landscape of the AONB to the south and west - this seems to have been overlooked in the Landscape Assessment
- The Landscape Assessment makes the assumption that because the development would be seen it would be harmful – if this view was taken everywhere there would be no development
- Careful consideration of scale, massing, design and location would mean a limited visual impact. Incorporate of single storey dwellings/chalet bungalows in the most visible locations would keep the ridge height to a minimum, further reducing the impact
- Acknowledged assessment of the impact of development on landscape character is a material planning consideration, it is only one consideration
- Landscape needs to be considered, but it is considered that with a detailed landscaping scheme, a Transport Statement and S106 package the site would offer a wide range of benefits to meet the District's housing need and provide long-term benefits to the village

Council response:

Chieveley is located within the AONB, and therefore, the impact on the landscape is paramount. All sites within the AONB are subject to a landscape assessment, which determines whether development on a site would be suitable. CHI007 and CHI010 were assessed in 2011, the 2014 assessment only considered new sites submitted to the council since the 2011 assessment, such as this site.

The Landscape Assessment considers all sites on a consistent basis, assessing the impact that development would have on the landscape character and quality within the AONB. Sequentially, where there are other sites available outside the AONB, or within the AONB but with less of an impact on the landscape, these are considered above sites which would have a detrimental impact on the landscape.

It is noted that careful design could reduce the impact on the landscape, however, in this location the landscape assessment states that any development would have a detrimental impact.

Ecology

- Trees along School Road are covered by Tree Preservation Orders and are recognised as important part of the wooded setting of the village. Careful assessment of the Root Protection Area and appropriate Arboricultural Impact Assessment would mean that development would not threaten the health or stability of the trees

Council response:

It is noted that the site promoter proposes to retain the trees and provide the relevant assessments and protection areas; however, this does not outweigh the landscape impact.

CHI017: The Old Stables, Green Lane

Responses received: 2

Consultation comments:

- The site should be rejected
- Development would change the character of the area
- Disagree that the site should be considered as part of the settlement boundary review
- In Parish Council survey the site had the lowest 'include' response of all sites, and third highest 'do not include' response. The site had the highest 'possibly include' response but none of these responses were clarified with additional comments
- Parish Council does not see any need for a radical change to the settlement boundary criteria
 - Inc. the first 2 criteria (on close knit physical character and dispersed or ribbon development), criterion 7 (open undeveloped parcels on the edge of settlements) and excluding from the boundaries areas of scattered and loose-knit development – therefore, the site should not be within the settlement boundary
- The SA/SEA states that development of the site (for 5 houses) would be out of keeping with the character of the area
- The SA/SEA does not take into account the cumulative effects of including this and CHI017 in the settlement boundary – impact on character of area, traffic on a narrow lane, landscape character
- Capacity has been assessed as 5 dwellings, in other places 5 dwelling sites have been put forward for allocation – this approach is inconsistent. Allocation of the site 'by the back door' should not be considered
- CHI017 and CHI001 would be considered together, which could result in the development of 10 dwellings, which would be out of keeping with existing development in the area and have already been rejected in the SA/SEA
- Previous appeal on this site as dismissed, stating that a clear precedent would be set for infilling other sites outside the Chieveley settlement boundary

Council response:

The site is not recommended for allocation. The site meets the settlement boundary review criteria and has limited development potential, therefore, is recommended for inclusion in the settlement boundary.

The Green Lane area of Chieveley is functionally part of Chieveley village, therefore it is considered acceptable to include within the settlement boundary. Development potential on the site has been revised to less than five dwellings. Any development coming forward would need to be in keeping with the character of the surrounding area, which would further limit the development potential of the site. The SA/SEA

has been updated to reflect this change in development potential. It is noted that development of 5 dwellings on the site would be out of keeping with the character of the area.

Sites with development potential of less than five dwellings are considered for inclusion within the settlement boundary. Where a site is suitable for less than five dwellings it is difficult to determine an exact development potential, as it will depend on the character of the area and specific nature of the site. In many cases it is likely that the site would only be suitable for one or two dwellings.

It is unlikely that any development within the revised settlement boundary would have a significant impact on traffic movements. Details would be dealt with at planning application stage.

Landscape assessment work has been carried out for CHI001, and it is considered likely that CHI017 would result in a similar outcome. The Landscape Assessment states that development of the site would result in little harm to the AONB as long as the existing boundary vegetation was retained. Further landscape work would be required to accompany any planning application received for the sites.

The previous appeal on the site would have been determined using the policies of the time. Any new application on the site would be determined using current planning policies. The revised settlement boundary redefines the 'settlement' area and protects those areas outside the new boundary from development.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

COM004: Pirbright Institute Site, High Street, Compton

Responses received: 14

1. General

Consultation comments:

- Core Strategy not based on a strategy which meets the full objectively assessed needs for housing.
- Contrary to Core Strategy AONB strategy (dispersed and unsustainable distribution of new housing).
- With the exception of the secondary school and leisure centre, the existing social and community infrastructure is no better and in some cases worse than in other Service Villages in the AONB.
- Notwithstanding the SPD, there is no justification for the proposed allocation.
- SPD was premature, prior to the Housing Site Allocations (HSA) DPD. Could affect the outcome of the DPD and undermine the AONB spatial strategy.
- Site is outside the settlement boundary, sets a precedent to move any boundary at any time; this is not preserving the countryside.
- Conservation Area and AONB do not seem to have been taken in to account.
- Only justified by being brownfield land. Priority to reuse brownfield land relates to previous government policy and no longer applies as it is just one of 12 core planning principles in the National Planning Policy Framework (NPPF). Consider alongside other principles including the active management of patterns of growth to make the fullest possible use of non-car travel modes and focussing on new development in locations which are or can be made sustainable. In the context of the NPPF, 140 dwellings appears excessive and unjustified.
- Firmly of the opinion that development of this scale constitutes major development in the AONB. Exceptional circumstances and public interest do not exist to justify the development of the site on the scale proposed.
- Reduce to 30-50 dwellings.

Council response:

The Core strategy Inspector decided that the Government's planning aims, as set out in the NPPF, were best achieved in the short term by the adoption of the Core Strategy (para 41 of the Inspector's Report July 2012) and made clear that the 10,500 housing figure is a minimum. The Inspector also gave the Council three years to produce a Strategic Housing Market Assessment (SHMA). This SHMA is finalised and the new housing figures will inform the revision of the Local Plan. The Council

has a 5 year housing land supply therefore the housing policies are in date and have full weight.

The Core Strategy sets out a housing requirement of up to 2,000 new homes in the AONB between 2006 and 2026. At March 2013, taking in to account completions and outstanding commitments, there was a remaining requirement of approximately 650. The number to be allocated will be less due to the inclusion of a windfall allowance. The distribution of new housing in the AONB has already been examined and agreed within the Core Strategy and this took in to account the Pirbright Institute which was flagged up as an opportunity site for redevelopment.

The owner of the site intends to consolidate their activities on to its site at Pirbright in Surrey therefore leaving the site in Compton vacant. This was originally intended to occur in March 2013. The Supplementary Planning Document (SPD) was therefore developed to guide the potential future redevelopment of the site and the Council does not consider its production to be premature. With the site being adjacent to the settlement boundary and brownfield land, the likely redevelopment of the site provides a significant opportunity to enhance many aspects of sustainability (including decontamination and reducing the existing harm to the landscape). The re-use of brownfield land is still a priority in national and local planning policy and that emphasis has not changed.

Service Villages have been identified through the Core Strategy settlement hierarchy which recognises that the individual rural service centres and service villages vary, reflective of the diverse nature of West Berkshire. The Core Strategy recognises that the site could provide a greater level of growth than that normally expected in a service village, which will have implications for the distribution of development. In the Core Strategy Inspector's Report (July 2012) para 77 the Inspector states *"There are also 2 large brownfield sites at Compton and Hermitage where substantial redevelopment for housing or mixed use might take place whilst achieving positive outcomes for the landscape. Accordingly, there is evidence to indicate that the scale of development could be delivered in a way likely to meet the aim of ADPP5"*.

The approach to development in the AONB is set out in Core Strategy Policy ADPP5 which calls for a landscape led approach. The AONB "will be a place where the landscape is managed to conserve and enhance its natural beauty in accordance with its national designation" and it will have "appropriate and sustainable growth that conserves and enhances its special landscape qualities". Core strategy Policy CS19 "Historic Environment and Landscape Character" ensures that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, by considering the natural, cultural, and functional components of the character as a whole. In addition, the AONB and Conservation Area were taken into account within the Pirbright SPD. The developable area of the site has been reduced as a result of its location within the AONB and impact on the landscape.

The North Wessex Downs AONB Unit commented on the SPD consultation in 2013 saying that they support the landscape led approach the Council has taken in the SPD in considering the future of the site. Landscape restoration of parts of the site will help ensure that any development meets the principle aims of the AONB designation, being the conservation and enhancement of the natural beauty of the landscape. The Unit also consider that the creation of a well designed new

sustainable housing development on an area of previously developed land within the village will help reduce the pressure on Greenfield site releases elsewhere within the AONB.

Development of such scale would be considered major development in the AONB (NPPF) however as previously examined and agreed as an opportunity site in the Core Strategy and through the SPD the Council considers the site to meet the NPPF test as a suitable site to bring forward for redevelopment in the AONB. It is not clear how the suggested figure of 30-50 dwellings (which would still constitute major development in the AONB) has been arrived at and this number would likely warrant the site unviable.

This DPD will be allocating sites outside the settlement boundary, i.e. sites in the countryside, to help deliver the required housing. Sites are then brought to within the settlement boundary to take them out of the countryside and to make them acceptable to develop in principle. There is a lot to consider when looking to allocate sites and this DPD was started back in September 2013. The consultation also sought comments on the Settlement Boundary Review criteria which provided an opportunity to comment on how the settlement boundaries would be reviewed through the plan making process.

2. Consultation

Consultation comments:

- Lack of consultation with the public.

Council response:

Public consultation on this stage of the DPD involved notifying all those registered on the electronic consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case with consulting on major planning applications, letters were sent to properties located within 100m radius of the proposed sites. The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. The public consultation ran for an extended period of 7 weeks. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the consultation was extensive with responses from about 4500 people. Additionally the adopted SPD for the Pirbright site was subject to extensive consultation with Compton residents.

3. Employment

Consultation comments:

- Core Strategy Settlement Hierarchy took account of employment in Compton; closure of the site will lose most of these jobs. No indication as to the amount of employment to be provided on the site.
- B1 use would need sequential assessment.

Council response:

The closure of the Pirbright Institute will result in a loss of some jobs however some new jobs are anticipated on the new site, and Compton still hosts Schering Plough (MSD) and Baxter Healthcare, together with links to the racehorse industry as well as education and local services. The level of employment to be provided on site will depend on the details of the planning application and the sequential approach (Core Strategy policy CS9).

4. Flooding

Consultation comments:

- Part of the site in Flood Zones 2 and 3.
- Inconsistent approach with Greens Yard planning permission (adjacent site).
 - Part of COM004 is within Flood Zones 2 and 3 and will be excluded from the development area, yet Greens Yard has permission for homes within Flood Zones 2 and 3.
- Concerns with sewerage system capacity.
 - Cannot currently cope and will be unable to cope with any more.
 - Thames Water must make sure the sewers are adequately sealed against water ingress and appropriately sized prior to any building on site.
- Concern the development will increase the risk of both groundwater and sewage flooding downstream.
- Environment Agency:
 - No development in Flood zones 2 or 3 or exclude this area from the site boundary.
 - Standard EA response for foul drainage, connection to mains sewer and capacity prior to occupation.

Council response:

A Flood Risk Study was completed for the SPD which included a detailed look at the risk of groundwater flooding. It therefore recommended, following a sequential approach at site level, that the 103m AOD contour line be the threshold at which 'more vulnerable' development is constructed above and 'less vulnerable'

development is constructed below. The Sustainable Drainage Systems (SuDS) infrastructure will need to take account of infiltration testing, to not increase the existing level of run-off, and to minimise the risk of groundwater entry during periods of high groundwater levels.

Part of the site falls within Flood Zones 2 and 3 and it is proposed that this part of the site will be excluded from the developable area as set out in the SPD. Should the site be allocated then further information will be provided in the policy allocation regarding the approach to flooding on the site, in line with the SPD. Development in Flood Risk areas are required to not increase flood risk elsewhere. Any planning application for redeveloping the site would be required to undertake a Flood Risk Assessment (FRA), to follow the flooding principles in the SPD (notably the approach to the 103m AOD contour line, unless the FRA proved otherwise, and a sequential approach to development on the site), and appropriate SuDS.

The adjacent Greens Yard site was granted outline planning permission in 2013. The applicants Flood Risk Assessment showed that the site was within Flood Zone 1 and that surface water flooding was a risk. As such a surface water drainage scheme is required by condition and an application for this was approved in March 2015.

Water Supply and Wastewater:

The adopted SPD for the site requires that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users.

Thames Water would require a drainage strategy from the developer to determine the impact on the infrastructure and the significance of the infrastructure to support the development. The current wastewater network is unlikely to be able to support the demand anticipated from the development and Thames Water is likely to require the infrastructure to be in place ahead of occupation of the development. This is in line with the advice received as part of the SPD process.

The Council will continue to work with Thames Water as the DPD progresses to plan for the necessary water and sewerage/wastewater infrastructure to service development in its area in accordance with the NPPF and the National Planning Policy Guidance (NPPG).

A FRA will be required and as stated in the SPD this should cover infiltration testing and details of Sustainable Drainage Systems (SuDS) to be implemented. Minimising the volume of runoff from the site will help to reduce the pressure on the drainage infrastructure.

5. Housing

Consultation comments:

- DPD suggests higher number of houses than the SPD.
- Density not high enough. A higher density would reduce the need for Greenfield sites in the AONB.

- 140 dwellings is out of scale and proportion to size and function of Compton.
- All the housing on one site rather than other sites.
- The level of affordable housing (30% = 42 dwellings) in an isolated settlement, lacking in facilities and remote from major centres is unsustainable.

Council response:

The Strategic Housing Land Availability Assessment (SHLAA) applied a density of 20 dwellings per hectare (dph) for sites on the edge of settlements within the AONB, where the sensitive nature of the surrounding countryside is a particular consideration. All sites within the AONB have therefore been assumed at 20 dph at this stage in the DPD process and further consideration will be given at the design stage of a site.

The SPD for the site sets out a clear planning framework to guide any future development proposals and gives more detailed information on the potential density of the site. The SPD however does not suggest a housing number for the site. In paragraph 5.5 it states that “The consultation responses on this matter were varied with the majority of responses highlighting that should the site be redeveloped, up to 100 homes would be acceptable”.

What the SPD does say is related to the housing density of the site. In accordance with principle LU6 of the SPD, the overall density of the site should reflect the character of Compton. Area B should be built to a lower density than Area C so as to reflect the built form pattern of the northern edge of the village and to prevent an adverse impact on the AONB.

The approach to the suggested housing number for the site in the DPD is the area of developable land and a suggested density. The SPD seeks other land uses which also require land take from the site and need to be taken in to account.

In accordance with Core Strategy policy ADPP5, the service village of Compton has some limited development potential and the COM004 site is an available brownfield site and opportunity site which would deliver a greater level of development than that normally expected for service villages. The re-use of brownfield land is a priority in national and local planning policy taking precedent over greenfield sites. COM004 is available and brownfield which was a principle reason for rejecting available greenfield sites in Compton.

Compton is located within easy reach of the A34 and M4, and according to WBC Passenger Transport has a 75 minute bus service (with plans to increase to 60 minutes), the village also benefits from a range of services and facilities. It is recognised that there will be a degree of car dependency given the location of the village. The 2012 Housing Register shows that 207 people are waiting for affordable housing in Compton.

6. Highways

Consultation comments:

- Concern with access on Churn Road.
 - Plans show as main point of access.
 - Rural road, 60mph limit.
 - No monitoring of traffic flow indicated in DPD.
 - No pavement which makes pedestrians already vulnerable to traffic. There is no room for a pavement without restricting access and damage to trees.
 - Principle access for agricultural traffic; is particularly busy during harvest and could be impeded by any road alterations.
 - Estimated additional 560 vehicle movements a day would make residents and pedestrians of Churn Road even more vulnerable to a traffic related injury or fatality.
 - Already good access from site to High Street. Site traffic would flow on to the High Street and Ilsley Road anyway so there is no sense in diverting traffic through Churn Road.
- Would not want to see access from Hockham Road.
 - Narrow, limited visibility in places and no pavement.
- Site traffic
 - Extra traffic on main access roads which are narrow in places.
- Road safety
- Construction traffic an issue on the rural access roads.
- Parking provision can be inadequate on sites. Provide spaces for visitors.
- High car dependency and long journey distances due to limited public transport service, limited range of local employment, services and facilities.
- Site currently employs some local residents, this is unlikely to be the case with replacement employment. New housing will therefore add to existing unsustainable travel patterns.
- Road crossings needed to make walking to school safer with the increased traffic.

Council response:

This was the Institute for Animal Health (Pirbright Institute) and would have already have been a significant generator of traffic. The Council's Highways team anticipate similar or even reduced traffic levels from the proposed uses for the site.

A transport assessment and travel plan would be required to accompany any planning application/s for future redevelopment of the site. Amongst other things, these would look at potential transport issues for all modes of travel arising from the proposed development, measures of mitigation, and ways to reduce the need to travel.

The DPD indicates a preference for Churn Road to have access but it also states that the access arrangements will need to be considered through any development proposal. Further discussions with Highways have amended the access advice to further reflect the SPD and as such the existing main access to the High Street should be retained as the main access as set out in the SPD. Landscape work undertaken for the SPD highlighted that the tree cover within and bounding the site should be conserved and enhanced, that the rural character of Churn Road and Hockham Road should be retained, and that there should be limited highway improvements retaining the existing carriageway width together with existing banks and roadside trees or hedges. This is carried forward in to the SPD and would prevent Churn Road from becoming a main access route but could be a secondary or emergency access. There is currently no indication that Hockham Road would be used for vehicular access to the site. Amendments will be made to the site policy to reflect the revised Highways access advice which is in line with the SPD. Access arrangements would be confirmed through the design process and any planning application for the site.

The development would be required to meet the most up-to-date standards for the level of car parking at the time of any planning application, taking in to account aspects such as the location and mix of dwelling types, and the local levels of car ownership. The HSA DPD also consulted on a proposed residential parking policy for new development which has been developed to reflect the different levels of accessibility across the District. The outcomes of the consultation will be taken forward in conjunction with the sites. The level of parking was also addressed in the SPD.

Footpath

Consultation comments:

- Concerned about the possible effects of development up close to the footpath with it fenced off on both sides, and that additional land to the north (edged red) might also be developed in the future
- The site is within the AONB and the footpath should be incorporated into the housing scheme without it being a 'tunnel' between high fences as this would be unsuitable in the AONB and discourage its use

Council response:

Public footpath COMP 26/1 runs along the north western boundary of the site, which extends along the northern boundary as footpath COMP 25/1, and is joined by a bridleway COMP 6/1. The public footpath originally bisected the site from west to east, and was diverted to its current route in 2003. The SPD highlights the opportunity to reinstate the former footpath through the site which would require appropriate design and landscaping for its integration. The footpath to the north of the site is on significantly higher ground than the Pirbright Institute.

As outlined in the SPD, it is not proposed to include the northern most part of the Pirbright Institute for development as redevelopment of this area would fail to

conserve and enhance the natural beauty of the AONB. Redevelopment of the site would be a unique opportunity to redress the harm caused to the AONB through the existing development and all the buildings and hard standings in this area (Area A) should be removed. There is therefore some opportunity to landscape this area to integrate the developable area into the landscape and to create an informal recreational area.

7. Infrastructure

Consultation comments:

- WBC Passenger Transport: Site is acceptable. It is an aspiration of the Transport Services Team to increase the frequency of the service.
- Do the schools have capacity?
- No specific requirement in the SPD for providing any additional infrastructure.
- Impact on GP practice, would require funding.
 - 3 sites in the DPD which will increase the patients to the Practice.
 - Chieveley site is near capacity. The Compton building has potential to expand but would require refurbishment to make it fit for additional use. Alternatively, could rebuild or have a new building on DPD site. Practice will have capacity if it receives funding to support this.

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could therefore be sought through CIL. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

It was not the purpose of the SPD to provide specifics on additional infrastructure; however the consultation highlighted a strong desire from the community to see some form of community facility on the site and this is reflected in the SPD.

8. Landscape

Consultation comments:

- Natural England: Landscape Visual Impact Assessment (LVIA) will be required; although the site is predominantly redevelopment so additional land take would be kept to a minimum.

Council response:

In 2011 a Landscape Sensitivity Assessment was completed for all proposed sites in Compton and in 2014 a Landscape Capacity Assessment was completed. A Landscape Framework was also completed in 2012 to inform the SPD. The site is a brownfield site and no additional land take is proposed.

9. Comments from the site promoter

- Supports the allocation but wants the area to the north and the cricket ground included within the settlement boundary to ensure that the most appropriate form of development comes forward with the necessary integrated open space/green infrastructure required by the SPD.

Council response:

The site boundary in the SPD was never intended as the proposed settlement boundary. Area A can form part of the site whilst being outside of the settlement boundary as it is intended to be used for green infrastructure. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation. The Council proposes to redraw the settlement boundary to also include the main access of the High Street, the cricket ground and the hostel site off Churn Road.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Compton Rejected Sites

COM001: Land to the east of Yew Tree Stables

COM012 (The Paddocks east of Roden House, Wallingford Road)

Responses received: 1 comment in support of both sites.

Consultation comments:

- Dispute the flooding risk issue.
- Sites prejudiced by COM004 taking the housing for Compton.

Council response:

In accordance with Core Strategy policy ADPP5, the service village of Compton has some limited development potential and the COM004 site is an available brownfield site and opportunity site which would deliver a greater level of development than that normally expected for service villages. The re-use of brownfield land is a priority in national and local planning policy taking precedent over greenfield sites. COM004 is available and brownfield which was a principle reason for rejecting available greenfield sites in Compton.

The risk of flooding from the various sources listed is correct. Flood risk remains a key issue when considering sites.

Further landscape work has been undertaken since the Preferred Options consultation for Compton which includes an assessment of COM012. The Landscape Assessment concluded that the site should not be pursued further as a potential housing site. In National Planning Policy Framework (NPPF) terms, development on the site would cause harm to the natural beauty and special qualities of the AONB by eroding the distinctive settlement pattern of Compton which forms an integral part of local character and distinctiveness and adds to the diversity of the AONB landscape as a whole. Previous landscape work assessed COM001 and the findings are included in the site assessment documents within the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA).

The SA/SEA provides further information as to the assessments made of the alternative sites and the reasons for their rejection.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Great Shefford Rejected Sites

Responses received: 7

1. Ecology and biodiversity

Consultation comments:

- The Ecology and Biodiversity benefits of the AONB should be evaluated and assessed at greater depth.

Council response:

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the SA/SEA. Where additional expert advice/reports have been produced these will be made available as part of the proposed submission consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

2. Flooding

Consultation comments:

High groundwater levels have caused flooding in previous years. This resulted in the sewerage system being overloaded.

The village has also suffered from flash flooding from surface water run-off in previous years.

Council response:

Due to the severe flooding, which resulted in the village being largely cut off during the floods of early 2014, no additional development is proposed for Great Shefford.

3. Highways and transport

Consultation comments:

- Additional development would increase the pressure on a local traffic pinch point
- Impact on the surrounding road network.
- If the main through route in the village is closed by flood water it has a big impact on the surrounding road network.
- Pedestrian safety maybe compromised due to limited visibility.

Council response:

Transport Assessment work has been carried out and indicates that the development of the sites will not have a significant impact on traffic levels.

Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider the local impact of the development, including safety, and consider any necessary mitigation measures. A travel plan promoting the use of alternative modes of travel to the car would also be required.

4. Settlement boundary

Consultation comments:

- Only infill building development should take place in the village until issues such as flooding, sewer capacity and a reliable electricity supply have been resolved.
- There should be no modifications to the settlement boundary unless very minor.

Council response:

No development has been proposed for Great Shefford. However, development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is now necessary to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy.

5. Comments from the site promoter (GSH001: land west of Spring Lane Meadows)

Flooding

- Unreasonable and unsound reason for ruling out site due to flooding, as the site itself is not liable to flood.

Council response:

Great Shefford is at risk from fluvial, surface water and groundwater flooding. During the winter 2014 flood event the village was largely cut off as a result of flooding. The site itself is not at risk from fluvial or surface water flooding, although recent groundwater flood risk modelling carried out for the Council shows that the northern part of the site is a risk from groundwater flooding during a 30 year event.

Location and housing numbers:

- Site GSH001 is deliverable
- A modest housing allocation will help meet local housing need and contribute to maintaining the viability of local services and facilities.

- Allocation would be in keeping with spatial strategy and in line with the LPA's general approach to site allocations in the draft plan.
- There is still "headroom" within the AONB area for a further modest allocation, not least because the draft SADPD directs too much growth to Lambourn.

Council response:

Comments noted.

The Housing Site Allocations DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The number of dwellings to be provided over the District in the longer term and the distribution of the number will be addressed in a Local plan to be commenced when the HAS DPD has been adopted.

Although Great Shefford is designated as a service village in the Core Strategy that does not mean that it is appropriate to allocate development within the village, this designation reflects the role and function of the settlement within the district. Flood risk is a significant constraint to development as it affects all elements of sustainability. Therefore, it is considered acceptable to limit development in an area at high risk of flooding, by not allocating sites for development within the village.

Sustainability

- The Council's Landscape Sensitivity Assessment (2011) acknowledges that the site is potentially suitable for development
- The site is not subject to any heritage or environmental constraint. There are no highway objections.

Council response:

Sites are assessed on a number of different aspects, not limited to landscape sensitivity and heritage. Whilst the specific site may not be within a floodplain, recent flooding events have caused the village to be largely inaccessible. Therefore, it is not considered appropriate to allocate development in this area.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

HER001: Land off Charlotte Close, Hermitage

Total responses received: 11

Total inadmissible comments: 1

Total responses processed: 10

1. General

Consultation comments:

- The proximity of the proposed development is likely to cause great anxiety and stress to vulnerable young people from Priors Court School who live in Charlotte Close, due to increased noise and disruption.
- Charlotte Close is bordered by an industrialised unit on one side, the busy B4009 on the other, an access route to the newly developed Hermitage Green and a green field consisting of various species of wildlife.

Council response:

Comments noted. The Council's Environmental Health Department has been consulted on the Housing Site Allocation DPD Preferred Options and will have further opportunity to comment throughout the process. No concern has been raised regarding this site. Construction times etc can be managed by conditions at the planning application stage.

2. Principle of development

Consultation comments:

- If homes were to be built on this site, the view to the field and wildlife would be lost and the area would turn into urban sprawl.
- Hermitage has virtually ceased to be a village and is rapidly turning into rural suburbia. It is time to call a halt.
- Hermitage has already had a significant development, with Forrest Edge and Hermitage Green. It is changing the dynamics of the village and its size.
- If homes were built the view and wildlife would be lost resulting in urban sprawl.
- Hermitage is a village and the ability to look at fields and trees, watch deer, rabbits and birds is exactly what should be expected of village life – this would be lost if more residential properties were built on this site.

Council response:

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.

The Core Strategy identifies Hermitage as a service village within a Settlement Hierarchy. This means that Hermitage, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Hermitage will accommodate some additional housing growth to 2026.

3. Environment

Consultation comments:

- No further building development should take place within the AONB.
- Can the loss of wild field, trees and habitat for deer, rabbits and birds, as well as the pleasure they bring, be justified by the building of 16 houses?
- The proposed site is on green belt land, outside the settlement boundary, designated partially to prevent development and therefore development here is unacceptable.
- There are reasons why areas are designated Green Belt and AONB. To build on the land would be contradictory and make the adjacent land vulnerable to similar future decisions.
- Site is within AONB and adjacent to the Berkshire and Marlborough Downs.
- The site is attractive to various species of flora and fauna.
- It has been suggested that England Nature describes the site as an area of great importance for its chalk grassland and it is of international importance for its population of early gentian. The area should be preserved.
- The area provides a rich habitat for a variety of birds, badgers, rabbits etc.
- Provided appropriate development is suggested at this site, and suggestions and recommendations made by a Landscape Visual Impact Assessment (LVIA) are followed the impact upon the AONB would be minimised if this site was developed.

Council response:

The site sits within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Conserving and enhancing the distinctive landscape character of the AONB is to be given considerable weight when assessing sites for development. The Council has therefore ensured that sites within the AONB promoted for development as part of the plan-led process were subject to a Landscape Sensitivity Assessment (LSA). This is a consistent assessment carried out by the Council's landscape consultant to determine whether development on each site would have any adverse impacts on the landscape.

For this site the Landscape Sensitivity Assessment (LSA) (2011) stated that development on this site 'would result in little harm to the natural beauty of the AONB' as long as enhancements and mitigation measures, listed in the assessment, are adhered to.

In addition, the Council's Ecologist has provided comments on each of the sites. An extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected.

4. Flooding

Consultation responses

- The site is low lying and subject to flooding.

Council response:

The site falls within an area at risk from surface water flooding and a small part of the site is within a Critical Drainage Area. Appropriate flood mitigation measures, in accordance with Core Strategy policy CS16, would need to be put in place as part of any proposed development scheme. Details of this would come forward as part of a planning application.

5. Highways and Transport

Consultation comments:

Access to the site

- Were the Charlotte Close land to be developed then the number of vehicular movements would increase significantly and would have to use a road not adequate for the purpose.
- How will traffic be stopped from using Charlotte Close as the entrance to the new development?
- Station Road is clearly designed to provide access for a limited number of vehicles.
- Charlotte Close struggles to cope with the current vehicle movements.

Highway network/traffic

- The B4009 is overloaded. When HGVs meet they have difficulty passing and there have been serious accidents. Additional traffic will aggravate these problems.

Road safety

- Station Road, being elevated, would mean that access to a new junction would be at a steep gradient and therefore vehicles using it would have restrictive sight lines causing a potentially dangerous situation.
- The junction with Prior's Court Road and Newbury Road, which includes a mini roundabout, already has very poor lines of vision and increased traffic, both during construction and following completion, would be potentially dangerous.
- Proposed access off of Station Road would be dangerous. It is already a hazardous junction and further traffic would increase the risk of accidents.

Council response

It is proposed that access to the site is taken off Station Road, in accordance with comments provided by the Council's Highways Department. It is considered that Station Road has the capacity to accommodate an increase in vehicle movements and appropriate sight lines can be achieved onto Station Road from the site.

Further clarification has been sought from the Council's Highways Department regarding the mini-roundabout at the junction of Station Road / Newbury Road / Priors Court Road / B4009. It has been confirmed that the impact of additional traffic generation may be limited due to the size of the proposed development, and Road Traffic Accident data from the previous five years do not highlight any safety issues.

Transport Assessment work has been carried out for all proposed sites and this indicates that development of the sites will not have a significant impact on traffic levels. Where additional expert advice/reports have been produced these will be made available (if not already) as part of the Pre-Submission consultation in the autumn of 2015.

Sites allocated for development will be required to provide a Transport Statement/Transport Assessment for the site to accompany any future planning application. This would consider in detail the local impact of the development, including access, and consider any necessary mitigation measures.

6. Infrastructure

Consultation comments:

- The Downland Practice could see an increase of 400 patients as a result of development in the area. The Practice will have capacity to accommodate the additional patients from these developments, if it receives funding to support improved services and facilities. All costs should come from S106 or similar external funding streams.
- There is no provision for improvement to the infrastructure.
- Drainage, water and electricity supplies are under pressure from the new houses constructed already.
- Further strain will be added to the primary school – a further 16 properties could mean up to 32 further school spaces required that cannot be accommodated by Hermitage or Curridge primary schools.
- From a public transport point of view, this site is acceptable. Contributions from any development in Hermitage could be used to bolster the existing bus service(s) in the area.
- The school is already over-subscribed.
- There is a substantial above ground electrically installation which will need to be removed.
- EA recommend that all allocated sites have a connection to the mains sewer. Where connection is not possible, development may impact on pollution to controlled waters.
- Prior to occupation of dwellings, improvements to the sewerage network to provide adequate capacity are required to be in place. As part of the policy allocation you can ensure that improvements and connections to sewerage system with capacity are carried out.

- EA recommend liaison with Thames Water at the earliest possible opportunity to determine where improvements are to be made and how they can be implemented.

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

On the information available to date Thames Water do not envisage infrastructure concerns regarding Water Supply, or Waste Water capability in relation to this site.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with Core Strategy policies CS14 and CS19 of the Core Strategy and the Quality Design Supplementary Planning Document (SPD).

7. Comments from the site promoter

- There are a number of local services and facilities within walking or cycling distance of the site, although there will inevitably be reliance for higher end services and employment there could be a level of car dependency to access Newbury as with development in all villages. The site is in close proximity of open countryside to help promote a healthy active lifestyle.
- The site is well located in relation to the settlement of Hermitage. As part of the site selection process the site has been the subject of a Sustainability Assessment/Strategic Environmental Assessment (SA/SEA). The assessment(s) concluded that the site was likely to have a neutral effect on sustainability, and

the SA/SEA did not highlight any significant sustainability effects. My Client concurs with the findings of this assessment, namely:

“The site is well related to the existing settlement. Landscape assessment indicates development would be acceptable subject to mitigation measures ensuring the protection of existing landscape features.

The site is at risk from surface flooding and a small part of the site is within a Critical Drainage Area; nonetheless, the Core Strategy requires the use of SuDS techniques in new developments.”

- The mitigation measures, referred to within the site assessments, required for the site are all deliverable and would be comprised within a landscaping programme as part of the development of the site.
- In terms of the matter of flooding, Sustainable Drainage Methods (SuDS) techniques would be included within the detailed proposals for the site’s development to mitigate this risk.
- The site is eminently deliverable in the short term
- In terms of the wider pattern of development, the release of this site could be seen as a logical development in the context of the village’s evolution.
- The DPD has been prepared using a sound evidence base which draws on the Strategic Housing Market Assessment (SHMA). They consider that the evidence base used provides the basis for objectively assessing the needs for market and affordable housing in the LPA’s housing market area, and that the sites identified in the Strategic Housing Land Availability Assessment (SHLAA) have been considered against consistently applied criteria, as well as the policies of the NPPF, and which will all contribute to the provision of a specific deliverable 5 year land supply.
- It is further considered that the inclusion and development of this site would be consistent with paragraph 14 of the National Planning Policy Framework (NPPF). My Client concurs that the DPD is sound in as much that it has been positively prepared, is justified, effective and consistent with national policy.

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Hermitage Rejected Sites

HER004: Land to the south east of the Old Farmhouse

Responses received: 1 (from the site promoter Nexus Planning)

Comments from site promoter

Sustainability:

- The adopted Core Strategy is not based on a strategy which meets the full objectively assessed needs for housing.
- The Settlement Hierarchy Topic Paper, July 2010 predated the publication of the NPPF in March 2012 and the Core Strategy Examination into the West Berkshire Core Strategy took place between November 2010 and May 2012. Therefore, due to this chronology, we believe that there is some inconsistency between the assessment of settlement sustainability undertaken by the Council on the one hand and Policy ADPP1 and the policies of the NPPF on the other.
- Policy ADPP1 and the NPPF (para 17) emphasise the importance of linking growth to the transport accessibility of settlements, we believe that this key element of sustainability should be given due priority in the identification of sites for inclusion in the HAS DPD.
- Hermitage is the closest Service Village in the AONB to a major centre (7.8km from Newbury). Jobs and higher order services are more accessible by all travel modes. Accessibility by road to the higher order services and employment opportunities is an advantage.
- Hermitage has a range of community services and facilities, including a primary school, and some employment opportunities at the garden centre and Dennison Barracks.
- This means that not only are jobs and higher order services more accessible by all modes of transport, but Hermitage offers the best opportunity to access jobs and services by bicycle.
- We consider that Hermitage is a sustainable location for new housing development, provided that the development is modest in scale and in proportion to the size of settlement and range of local infrastructure. We consider that development of up to 30 dwellings on sites HER001 and HER004 (part) represents a sustainable way of meeting local housing needs in the plan period.

Availability and Suitability:

- Confirm that site HER004, including that part of the site lying to the south east of the Old Farmhouse, which is being proposed for allocation, falls within the Estate of Mr. Neville Baker. We can also confirm that the Old Farmhouse and adjoining land is included within the Estate.
- There are no known legal/ownership constraints which may limit or prevent development on that part of site HER004 being proposed for development.

- Access would be from Lipscomb Close
- The site has capacity for 14 dwellings, if developed with HER001 there is potential for the two sites to deliver 30 dwellings

Landscape:

- We agree with the findings of the Landscape Sensitivity Assessment and in our view there is a logical and strong landscape justification for developing the two parcels of land together (HER001 and part of HER004).
- HER001 is well related to the existing settlement however it sits at the western end of Hermitage. Given that land to the south east of the Old Farmhouse lies between HER004 and the main part of the settlement, it is even more closely related to the existing settlement pattern.
- Developing HER001 in isolation would create an irregular shape and extend the village in a southerly direction. Developing part of HER004 would represent logical rounding off of the settlement edge.
- Developing part of HER004 in conjunction with site HER001 would provide the opportunity to mitigate the visual impact experienced by properties on Newbury Road and Lipscomb Close.
- Developing HER004 (part) in conjunction with site HER001 would enhance the setting of Hermitage and the AONB landscape.

Highways and transport:

- In our view, transport accessibility and proximity to services and facilities should be given the same emphasis in assessing the suitability of sites for inclusion in the HSA DPD.
- The site is closer to services and facilities in Hermitage than the HER001 site.
- Hermitage is served by regular buses on a circular route from Newbury, many other service villages do not have such a good public transport service.
- HER004 and the Old Farmhouse are in the same ownership therefore, it would be possible to create a new pedestrian / cycle link between the combined development and Newbury Road providing shorter, more direct link local services.
- The SA/SEA indicates the Council's Highways team accepts that access can be achieved from Station Road to serve a combined development of up to 30 dwellings. Some concerns are raised about the impact on the mini roundabout at Newbury Road/Station Road
- The inclusion of the site (HER004) as part of a combined development presents opportunities to provide additional points of highway access to serve part of the development. This would reduce the overall impact of development on the mini roundabout junction and improve the dispersal of traffic on the wider highway network.
- Alternative accesses could be from:
 - Newbury Road, via the Old Farmhouse Site
 - Via the existing access off Lipscomb Close
- If it is subsequently established that development on the site can only be served by an access off Station Road, i.e. via the HER001 site, it is possible that future development on the site would be sterilised.

Conclusion of main points:

- When assessed against the key considerations of landscape impact and transport accessibility, we consider that site HER004 is worthy of allocation in conjunction with the adjoining HER001 site.
- Policies ADPP1 and ADPP5 of the Core Strategy and Paragraph 17 of the NPPF in particular establish that the impact of development on the natural beauty of the AONB landscape and access to transport, services and facilities are key considerations.
- In comparison with the other Service Villages, it is closest to a major centre (Newbury), which means that it has better access to employment opportunities and higher order services, such as hospitals, further education, retail, leisure and the wider public transport network.
- Hermitage is one of the best, if not the best, of the six Service Villages in the AONB in terms of transport accessibility and therefore a sustainable location for new housing.

Council response:

The Core Strategy was adopted in July 2012, four months after the NPPF was published. The NPPF therefore formed the policy framework with which the Core Strategy had to comply in terms of meeting the tests of legal compliance. The Core Strategy Inspector invited comments from interested parties following the publication of the NPPF during the Examination of the West Berkshire Core Strategy, thereby ensuring that he explored this issue fully during the examination process.

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where the housing will be provided.

The Housing Site Allocations (HSA) DPD follows on from the Core Strategy and does not reassess the housing number or distribution but seeks to allocate small scale housing sites to meet the requirement set out within the Core Strategy. The number and distribution of dwellings to be provided over the District in the longer term will be addressed in a Local Plan, to be commenced when the HSA DPD has been adopted.

The Core Strategy identifies Hermitage as a service village within a Settlement Hierarchy. This means that Hermitage, along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Hermitage will accommodate some additional housing growth to 2026. It is proposed that this will take place through the allocation of sites for housing through the HSA DPD.

It is noted that the site promoter supports the allocation of part of HER004. It is important to point out that paragraph 5.34 of the HSA DPD states that 'it is proposed

to consider including part of the land to the south east of the Old Farmhouse (SHLAA reference HER004) within a revised settlement boundary for Hermitage...'. The Preferred Options DPD makes it clear that part of the site is to be considered further, not that it is proposed for allocation as set out in the site promoter's consultation response.

With regard to the landscape, a Landscape Sensitivity Assessment (LSA, 2011) was carried out by the Council to assess the impact of development on the AONB. It concluded that 'Development on this site would result in harm to the natural beauty of the AONB.' It recommends that, the whole site should not be pursued, but it may be that a small area in the north-east of the site (between the public house and the access off Lipscomb Close) could be developed together with HER001. This will be considered further as part of the DPD.

Further clarification has been sought from the Council's Highways Department regarding the access points and the mini-roundabout at the junction of Station Road / Newbury Road / Priors Court Road / B4009. With regard to access points, it has been confirmed that should the site be included within the settlement boundary or allocated within the DPD, then an access off Station Road in conjunction with HER001 is preferable. An access off Lipscomb Close is also acceptable should this be necessary. It has been confirmed that should the site be taken forward the impact of additional traffic generation may be limited due to the size of the proposed development, and Road Traffic Accident data from the previous five years do not highlight any safety issues.

Sites allocated for development may be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider in detail the local impact of the development, including access, and consider any necessary mitigation measures.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Hungerford General Comments

Responses received: 11

1. Principle of Development

Consultation comments:

- Concern regarding impact on nature and character of Hungerford
- History of poor quality existing development in the area
- Need to minimise development on green land
- Sites breach the settlement boundary
- Housing should be to support local needs
- Development should be proportionate for the role and function of Hungerford
- Proposed numbers for Hungerford (87 – 101) are welcome and considered to be proportionate and in line with the town plan and local needs
- Town Council prefer the Eddington Sites but with significant modifications
- Town Council suggest the following sites are taken forward to provide 86 dwellings
 - HUN001 (Smitham Bridge Road) 26 dwellings
 - HUN003 (Hungerford Vets) 5 dwellings
 - HUN015 (Land at Bath Road) 7 dwellings
 - HUN020 (Hungerford Garden Centre) 17 dwellings
 - HUN023 (Oakes Bros, exc. St John Ambulance Site) 11 dwellings
 - HUN005 (Folly Dog) 20 dwellings
- There is a discrepancy in housing numbers across the district – Both Thatcham and Hungerford are proposed 87 dwellings, but Hungerford has a much smaller population
- No mention of windfall allowance taken into account
- In view of development proposal at North Newbury there might be little need for development in Hungerford
- The DPD should look to allocate more housing than currently provided to achieve appropriate distribution of growth
- Significant number of new dwellings is not desirable
- Local residents want to protect and preserve the historic and rural character of Hungerford
 - In particular the following considerations are seen as key
 - Protection of the Marsh, Common and surrounding countryside
 - Traffic/congestion as a result of new development
 - Maintenance of the traditional character of Hungerford

- Development should be consistent with character of the town and location in the AONB
- Neither PO sites meet the wishes of local residents and are not in compliance with the NPPF
 - Para 17 (encouragement to use brownfield sites)
 - Para 115 (great weight given to the protection of the AONB)
- Town Council proposals supported
 - HUN001/023 are within walking distance of the town centre
 - Make better use of brownfield land
- PO sites are further from local services/facilities than other identified sites (Town Council preferred sites)
- Town Plan seems to have little weight as key findings have been ignored
- Ribbon development on A338/A4 should be avoided

Council response:

Policy CS1 of the Core Strategy sets out the Council's approach to new housing, with development primarily being developed on suitable previously developed land, with Greenfield allocations being required to meet the Council's housing requirement. The Housing Site Allocations DPD looks to allocate these Greenfield sites.

It is noted that the Town Council preferred the Eddington Sites, although there are varying local views as to which site would be preferable for development. Of the Town Council's preferred sites for allocation, the Oakes Bros site (HUN023) is located within a protected employment area, and therefore, the allocation of this site would be contrary to policy. The site at Smitham Bridge Road (HUN001) was not included as a preferred option as the Council have significant concerns regarding access, and the links with the neighbouring industrial estate. Standard densities have been used across the sites, taking 20dph for all sites in the AONB, although the final density of any site to be allocated would be agreed through the planning application process. The Council have carried out transport assessment work to compare the transport impact of the two preferred options sites, this assessment indicates that, based on current travel to work/school patterns, and the distances involved development to the south of Hungerford would have a lesser impact on traffic in the High Street than development to the north.

The Core Strategy states that Thatcham will have more limited growth during this plan period to allow for a period of consolidation following several years of development. Therefore, Thatcham is proposed to have less than 100 dwellings allocated to it through the DPD. New development can help to maintain the vitality of a town centre by bringing more people in to the community.

A windfall allowance is taken into account when calculating the remaining requirement for allocation. In the AONB a windfall allowance for the whole of the plan period is used, rather than just the first 5 years as with the other spatial areas.

Development of the site at North Newbury is contrary to policy, and the planning application may be refused. Even if the site was to come forward at some point it would be to meet the needs and requirement for the Newbury/Thatcham spatial area, not the AONB.

The allocation of sites for development is in accordance with the NPPF. Where the Council are aware of suitable brownfield sites these have been taken into account when calculating the remaining housing requirement. All sites within the AONB have been subject to a landscape assessment; those sites which are considered to have an unacceptable impact on the AONB have not been recommended for allocation.

Consideration of the historic and rural character of Hungerford is taken into account, and any sites being allocated for development would be required to consider the character of the area in their designs submitted at planning application stage.

The Hungerford Town Plan is taken into consideration, alongside other consideration and planning restrictions. The Town Plan is not a neighbourhood development plan, which would allow the Town Council to write their own planning policy document and allocate land for development in the area.

Site design would be considered at planning application stage

2. Density

Consultation comments:

- Housing densities are too low
- will be challenged by developers
- Smaller houses at higher density are needed, which would reduce the need to develop on Greenfield sites
- Some brownfield sites in the AONB are not being developed at a high enough density (e.g. Compton)
- A “one density for all” approach is not appropriate, more realistic densities should be applied, especially in an area where smaller homes are needed. (low density usually relates to large homes)

Council response:

Standard densities have been used across all sites. All AONB sites have been given an indicative density of 20dph, with the majority of other sites having a density of 30dph. This lower density in the AONB reflects the importance of the character of the

landscape. The final density for allocated sites will be agreed through the planning application process. Some sites may include a range of densities across the site.

Housing size and mix would need to be in accordance with policy CS4 of the Core Strategy. Where there is a locally identified need for a certain type of housing this can be taken into consideration at the planning application stage.

Compton is already anticipated to get a significantly higher amount of development than the service villages or rural service centres due to the brownfield nature of the site. The density on the site is restricted by the impact on the AONB.

3. Highways and transport

Consultation comments:

- Development should minimise the traffic impact on the High Street

Council response:

The Council have carried out transport assessment work for the two preferred options sites using travel to work patterns from the 2011 census, and the 2014 School travel survey data to look at travel habits and the likely transport impact of each of the sites. The southern site is considered to be slightly better in terms of transport impact due to its proximity to education provision and the town centre.

4. Infrastructure – education

Consultation comments:

- Need to protect and support Hungerford Primary school
 - is located in the centre of the town
 - Development at the south with provision of a primary school is not welcomed as would create competition and issues regarding catchment areas have not been answered by WBC. Access would be problematic for majority of parents, the current school is within walking distance for most pupils
 - 10 year plan for education being considered

Council response

The current proposal for education provision in Hungerford is to expand the primary school. The safeguarding of land for future education provision is welcomed by the Local Education Authority as this will allow for future flexibility. Both sites being considered have offered land for a school should this be required. Any new school could potentially result in the changing of catchment areas at a future date.

5. Landscape/Setting

Consultation comments:

- Need to minimise the impact on the AONB
- Need to protect the environment

Council response:

All sites in the AONB have been subject to landscape assessment. Only sites which are acceptable for development in landscape terms have been recommended for allocation. Protection of the special landscape quality of the AONB is paramount.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

HUN007: Land east of Salisbury Road, Hungerford

Responses received: 54

1. General

Consultation comments:

- Object to development on either site, but if required the Eddington sites would be better
- Development should be in line with the wishes of town residents and Hungerford town Council
- Southern approach to Hungerford has already been ruined by the Kennedy Housing Estate and excessively large roundabout
- Insufficient reasons for rejecting other sites
- Prefer development on this site to the Eddington Sites as closer to education provision and can easily accommodate a new school/school extension
- Impact on tourism commerce
- Recognition that some development is needed
- Weighing up positives and negatives of each site in terms of benefits for Hungerford residents – this should be the preferred option
- The council need to resist government pressure to continually push-out settlement boundaries and concrete over Greenfield sites

Council response:

A range of responses have been received, both supporting and objecting to the allocation of this site. The wishes of the Town Council are not representative of the views of all local residents.

This site is closer to the Town's education provision than the Eddington Sites as it is located adjacent to John O'Gaunt Secondary School and only 1km from the primary school (compared to 1.7km from the Eddington sites).

The Core Strategy sets the minimum number of dwellings the Council need to provide between 2006 and 2026 and the spatial strategy for where sites will be allocated. Going forward, Councils are required to assess their own housing need (Objectively assessed need - OAN) through a Strategic Housing Market Assessment (SHMA). The Council's SHMA has been carried out in conjunction with the other Berkshire Authorities and has now been published. The Housing Site Allocations DPD will fulfil the remaining Core Strategy requirement and provide additional flexibility. It will be followed by a Local Plan which will allocate additional development over the longer term.

2. Principle of Development

Consultation comments:

- It does not make sense for Hungerford to have over 100 dwellings, when other sites in the AONB (e.g. The Kennet area of Wiltshire) are having none, or only brownfield development
- It is clear that those living in the north of Hungerford will want development to the south and vice versa – an independent assessment needs to be made to determine the most sustainable location and this should be published as part of the consultation process
- Smaller sites with less visual/social impacts should be considered
- Development is outside the settlement area on green belt in the AONB and a conservation area
- No development should take place to the south as almost all jobs are in Swindon, Newbury, Marlborough or further afield
- Development in Hungerford should be restricted due to only one main bridge over the canal and river.
- The town centre is a conservation area, more traffic through the town will not conserve it
- Precedent set for future development to the south
- Development should be in keeping with the size of a settlement – massive developments are not in scale for a town of under 5000 inhabitants, even places like Thatcham with around 16000 people would have difficulty absorbing such large expansion

Council response:

All Local Authorities have different housing requirements and spatial strategies. West Berkshire Council's housing requirement and spatial strategy is set out in the Core Strategy (2006 – 2026). The Core Strategy sets out that up to 2000 dwellings will be provided in the AONB, and while there is a preference for brownfield land, Greenfield sites will need to be allocated in order to meet the Council's housing requirement.

The Council's site selection process provides an independent assessment of the sites. This is published as part of the SA/SEA.

All sites being considered for allocation have been subject to Landscape Assessment work. Only those sites which have been assessed as being acceptable in landscape terms are being taken forward and considered for allocation.

West Berkshire does not have a green belt and the site is not located within the conservation area.

There are a number of employment opportunities in Hungerford, and the Council are resisting development of non employment uses on protected employment areas such as Charnham Park, Station Road and Smitham Bridge Road, as this would be contrary to planning policy. It is recognised that a number of residents do travel from

Hungerford to other places for work, however, there is a regular rail service from the town to the east and west, as well as regular bus services all providing alternatives to car travel.

It is noted that there is only one crossing of the railway and canal in Hungerford.

The settlement boundary will be redrawn around the developable area of the site, which will restrict further development of the site.

The Core Strategy states that Thatcham will have more limited growth during this plan period to allow for a period of consolidation following several years of development. Therefore, Thatcham is proposed to have less than 100 dwellings allocated to it through the DPD. New development can help to maintain the vitality of a town centre by bringing more people in to the community.

Land use

Consultation comments:

- Brownfield sites, not in the AONB are available to the north of the town (HUN001, 003, 015, 020, 023, 005)
- No account of scope for housing of PDL/Brownfield sites
- The required development can be achieved by building on brownfield sites

Council response:

All sites in Hungerford are in the AONB. HUN003, 015 020 and 023 are brownfield sites, with HUN001 and HUN005 being Greenfield sites.

Where the Council are aware of suitable Brownfield sites, through the SHLAA, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy makes it clear that while there is a preference for the redevelopment of brownfield land, the allocation of Greenfield sites on the edge of settlement would be required to meet the Council's housing requirement.

Sites within protected employment areas (PEAs) such as HUN023 are not considered suitable for residential development. PEAs will be holistically reviewed as part of the new local plan, but until that time residential development on these sites is contrary to policy.

Other sites

Consultation comments:

- Consideration should be given to development north of Hungerford between the A4 and M4 – would give faster access to M4 and Newbury and avoid frustrations of driving through the High Street every day
- Eddington sites should be considered if a footbridge/pedestrian crossing to the A4 could be provided and a new crossing in Bridge Street to improve road safety
- Use of the Oaks site should be considered

- Development at Eddington would be more intrusive than on this site as it is completely invisible to anyone other than in the immediate vicinity
- Development of the Eddington sites would result in the loss of the Garden Centre and Vets – both of which are important amenities, this site would not result in the loss of such amenities
- The SA/SEA does not provide sufficient justification for why specific sites have been discounted
- HUN022 appears to have a very similar profile to HUN007

Council response:

Development to the north, while having quicker access to the M4/A4 could result in more traffic travelling to the south to reach the local education provision, as both schools are some distance from the site, with limited alternative transport options.

The Oaks Brothers site is within a protected employment area; therefore, residential development on the site is currently contrary to policy.

Landscape work carried out for the sites shows that parts of both sites are acceptable in landscape terms. The garden centre site is part of the Eddington group of sites. It is in private ownership and being promoted for development, therefore, if it was allocated the garden centre would be lost.

Landscape Assessment work carried out states that only the southern part of HUN022 could be suitable for development, as the proposed access to the site is located to the north, outside the acceptable developable area there are concerns regarding access to this site without development of other adjacent sites. The Landscape Assessment also states that there should be no physical or visual link between HUN007 and HUN022; therefore, the development of both sites could lead to a significant negative impact on the AONB. HUN022 is also less well related to the existing settlement than HUN007 due to the presence of the water works to the south of the site, which separates the site from the existing settlement.

3. Consultation

Consultation comments:

- Development will have an impact on all residents, not just those living within 100m of a site

Council response:

The Council used a number of ways to publicise the consultation, including sending letters to those living within 100m of a site (in line with planning application notifications). Details were also published on the Council's web site, and there was substantive press engagement including the use of local community media. Workshops were held with Parish/Town councils to discuss the potential sites to inform the site selection process. Parish Council were encouraged to engage with local people, at this stage, and to feedback local views. Parish Council were also

asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

4. Ecology

Consultation comments:

- A woodland buffer would need careful design – request that this is extended to encompass the exiting footpath so it becomes an attractive walkway through the site
- There will be no impact on the River Kennet SSSI (unlike from development to the north)
- Loss of arable farmland
- Impact on Freemans Marsh SSSI would need to be considered
- Development of this site is unlikely to have an impact on the water quality in the River Kennet, which would be impacted on by runoff from the Eddington Sites

Council response:

The Council's Ecologist has been consulted on all preferred options sites. No concerns have been raised regarding this site. Natural England has confirmed that they do not have any concerns regarding development on these sites in relation to the Kennet and Lambourn or Freeman's Marsh Site of Special Scientific Interest (SSSI).

5. Employment

Consultation comments:

- Lack of employment opportunities in Hungerford

Council response:

There are a number of employment opportunities in Hungerford, and the Council are resisting development of non employment uses on protected employment areas such as Charnham Park, Station Road and Smitham Bridge Road, as this would be contrary to planning policy. It is recognised that a number of residents do travel from Hungerford to other places for work, however, there is a regular rail service from the town to the east and west, as well as regular bus services all providing alternatives to car travel.

6. Flood risk

Consultation comments:

- Storm drains do not function effectively
- Increased risk of sewer flooding in other areas
- SUDs would need to be utilized
- The EA flood maps show this area is at high risk of flooding

- Water already runs off the site through the ROW onto Priory Road
- Local gardens are often waterlogged showing there is limited opportunities for drainage
- Has a flood survey been carried out on the site?

Council response:

Comments relating to sewage flooding are covered above.

The site is not within an Environment Agency flood zone, and is not within an area of high surface water flood risk although there are small pockets of the site which are within a surface water flood risk area.

A flood risk assessment would need to be provided at planning application stage and would need to consider all sources of flooding and set out mitigation measures, including Sustainable Drainage Methods (SUDs) to ensure water generated on the site is dealt with on the site.

7. Heritage

Consultation comments:

- More archaeological assessment is required for the site – a requirement should be set out in the DPD should the site be allocated

Council response:

The site assessments make it clear that further archaeological assessment would be required on the site. This will be set out in the site policy.

8. Highways and Transport

Traffic/congestion

Consultation comments:

- Salisbury Road is narrow and busy – dangerous bottlenecks occur at the junction with Atherton Road
- Folly Dog Leg field would be a logical site given commuting patterns
- Significant levels of congestion on the High Street in the am peak
- Deliveries to the Co-op cause congestion
- 60% population work outside Hungerford which will mean new residents are likely to commute out of the village
- Will increase traffic on the High Street
- Southern development will cause less traffic disruption
- The A4 is extremely busy at peak times and is a traffic black spot
- Most residents would need to get to the A4/M4 and travel through the town
- 101 houses will most likely have 2 cars each all of which will be trying to use the High Street

- Use of Hungerford Common/Lower Denford as a rat run to avoid the High Street and A4
- Advanced planning for infrastructure required – bypass, additional parking
- Distance from town centre, Eddington sites are closer
- Alternative road route needs to be considered if a primary school is to be provided on the site
- There are currently 5 roundabouts on the A338 causing considerable build up of traffic
- Impact on journey times through the High Street

Council response:

The Council's Highways Development Control Team has not raised any concerns regarding the development of this site. Details of any highways improvements needed would be considered at planning application stage through a Transport Assessment.

Given the distance from the Eddington Sites to the local schools, and current travel to school patterns, it is likely that parents would drive their children from the Eddington Site to school, which would make traffic along the High Street worse, than from development at this site, which is within walking distance of the local schools.

It is noted that the A4 through Hungerford can be busy at peak times.

Only 41% of people living in Hungerford have 2 or more cars (based on the 2011 census), with 44% having one car, and 15% no car. Therefore, any new development is likely to follow the same pattern, with less than half the residents owning more than one car. It is estimated that the site would generate approximately 61 traffic movements during the morning peak and not all of these will use the High Street. A Transport Assessment would be required to accompany any planning application on the site, which would need to look at traffic movements from the site, and set out details of appropriate mitigation where required.

The HSA DPD will include new residential parking standards, which should mean that new development provides enough parking spaces for residents.

Details regarding access to any school to be provided on the site would be considered as part of the Transport Assessment to accompany a planning application.

Road safety, walking and cycling

Consultation comments:

- More traffic will impact on Road Safety for those walking/cycling
- Pavements into and out of town are very narrow and unsuitable for the elderly, or those in wheelchairs
- Development would encourage walking into town and use of the footpaths to Ham and Shalbourne

- Site located at the top of a hill which would make walking difficult for the elderly/young/infirm resulting in more car journeys

Council response:

The Transport Assessment that would accompany any planning application to the site would need to consider road safety for those walking and cycling.

The Council's Highways Development Control Team has said that footways would need to be widened alongside the A338 to allow for safe walking routes to and from the site.

Hungerford is built on a hill; therefore, where ever development is located would involve some degree of walking up or down a hill to reach the town centre. Of the sites included in the preferred options, both would involve walking up hill for one part of the journey into the town centre (on the way from the Eddington Sites, and on the way home from HUN007).

Parking

Consultation comments:

- Lack of parking for shoppers
- Lack of parking at Tesco car park
- Lack of parking at the station

Council response:

It is noted that there is pressure on parking in Hungerford.

Public transport

Consultation comments:

- Difficult to access public transport (20min walk to station)
- 5.57% WB residents use some form of public transport to get to work, compared to 10.5% for England & Wales.

Council response:

The station is within the acceptable walking distance of the site based on CIHT (2000)'s walking distances for commuting or travel to school. All the potential housing sites around Hungerford are approximately equidistance (approx. 1.5km) from the railway station.

9% of West Berkshire's population use public transport to get to work, compared to 13% in the South East (2011 Census). Train travel in Hungerford is higher than the West Berkshire Average at 6%, although only 1% use the bus as their main method of travel to work. New development often results in improved public transport

services, and all sites would be required to produce a site travel plan which will promote and encourage the use of public transport as an alternative to the car.

9. Infrastructure

Consultation comments:

- General infrastructure improvements required before development can take place
- Site is closer to town services/facilities (e.g. Doctors, playgroup, bowling green, tennis courts)

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, it is accepted that this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Education

Consultation comments:

- Potential for a new primary school as part of the scheme
- Children should walk to school, with development here having a safer route to school – taking 10min, compared to 45 from the northern sites
- Site is not best placed for a primary school as it will result in parents driving up the hill to drop of children, resulting in more congestion
- How will the school cope with increased demand?

- Many out of town children attend the school, so Hungerford children cannot get a place

Council response:

The current education plan for Hungerford is to expand the existing primary school to meet current demand. However, the Local Education Authority would like to see part of the site safeguarded for education provision. The allocation of school places is subject to the School's admissions policy.

The site is adjacent to the secondary school and less than 1km from the primary school; therefore, the majority of pupils should be able to walk to school.

Medical services

Consultation comments:

- Doctor's waiting times are very long

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP).

Utilities

Consultation comments:

- Sewerage system to the north is over capacity and a new system is required
- While there is a legal "right to connect" the existing infrastructure is not of a suitable size to accept additional flow. The sewer would need to be upsized the entire length of Priory Road, Salisbury Road/High Street which would cause considerable disruption to residents
- Would be easier to upgrade the existing pumping stations for the site in the north

Council response:

Thames Water has been consulted on all the preferred options. No concern has been raised over water supply, although there is concern over wastewater services. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. A drainage strategy would be required as part of any planning application on the site.

10. Landscape/setting

Consultation comments:

- Considerate layout and design will be crucial as the site is in the AONB
- The site is in the AONB
- Extend the built up area of Hungerford into the countryside

- Development would compromise the approach to Hungerford from the south and views of Coombe Gibbet
- Insufficient consideration given to the impact on the AONB for all sites
- The last developments in Hungerford already encroach into the AONB and are very visible
- Tree belt to rear of De Montford Grove should be retained
- Tree planting will afford some privacy
- An LVIA would need to be produced for the site
- The SA/SEA automatically excludes sites under Landscape – why has this been ignored for this site?

Council response

A Landscape Sensitivity Assessment (LSA) (2011) carried out on the site indicates that development on northern part of the site would be acceptable, subject to certain mitigation measures. Mitigation required includes woodland buffers to define the new edge of the settlement and careful design to respect the site's semi-rural location. A Landscape Visual Impact Assessment (LVIA) would be required to accompany any planning application for the site, which would need to set out the details of the mitigation measures to be provided.

The SA/SEA automatically excludes sites on landscape grounds where the LSA states that development on a site would not be acceptable.

11. Settlement boundary

Consultation comments:

- Meadow View site at the rear of Faulkner Square is perfect for 2 high quality homes and should be included within the settlement boundary
- Extending the settlement boundary is destroying the AONB by stealth

Council response:

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

Meadow View and Faulkner Square are already within the settlement boundary so do not need to be allocated, any development here would be considered through the planning application process as there is a presumption in favour of development for sites within the settlement boundary.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

HUN003, HUN005, HUN006, HUN015 and HUN020: Eddington Sites – Hungerford Veterinary Centre; Folly Dog Leg Field (part of); Land at Eddington and Hungerford Garden Centre

Responses received: 44

1. General

Consultation comments:

- The site should not be developed
- Preferred option for development
- HUN007 is more suitable
- This is not a reasonable alternative to HUN007 – HUN007 is in an more sustainable location
- Disagree with Parish Council's preference for this site/Town Councils preferred option ill thought through
- Need to ensure once sites are developed they are not used as a form of investment
- There should be an independent assessment of the north/south development option to assess the relative sustainability of the sites
- Development should embrace the latest low energy building
- Need to resist government demands to continually push out settlement boundaries and concrete over Greenfield sites

Council response:

A range of responses have been received, both supporting and objecting to the allocation of this site. The wishes of some residents and the town Council appear to be contradictory.

All new residential development is required to pay the Community Infrastructure Levy (CIL); this money is used to invest in infrastructure to help mitigate the impact of the development.

The Council's site selection process provides an independent assessment of the sites. This is published as part of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA).

Energy efficiency of development is dealt with by Building regulations, not planning.

The Core Strategy sets the minimum number of dwellings the Council need to provide between 2006 and 2026 and the spatial strategy for where sites will be allocated. Going forward, Councils are required to assess their own housing requirement (Objectively assessed need - OAN) through a Strategic Housing Market Assessment (SHMA). The Council's SHMA has been carried out in conjunction with the other Berkshire Authorities and has now been published. The Housing Site Allocations DPD will fulfil the remaining Core Strategy requirement and provide additional flexibility.

2. Principle of development

Consultation comments:

- Makes no sense to develop here, any development is planned for the AONB in the Kennet area of Wiltshire and Marlborough is to use brownfield land
- Allocation of housing is not equitable nor proportionate (Thatcham population 22k only 87 homes to be allocated, Hungerford 5.5k population 87 homes to be allocated)
- Support allocation of small sites to help ease local housing pressure
- Ribbon development along A4 would further divide the town into a main part and a suburb
- Small sites largely a continuation of Cottrell Close (HUN006) – could have access through Cottrell Close
- Cottrell Close was the last major development in Hungerford and was built on Greenfield land – the visual impact from the A4 is greater than it could have been, so an opportunity to learn from previous mistakes
- Would prefer smaller sites with less visual and social impact
- Growth should be in proportion to the area
- Development on HUN005 in its entirety would be disastrous as any building above the established housing line would impact on the landscape and destroy the main entrance to Hungerford
- Some building at the lower levels (HUN015, 003, 020) might be acceptable.
- Prefer use of less environmentally sensitive sites
- This would be a satellite settlement to Hungerford, with no benefit to Hungerford itself due to location on the A4

Council response:

All Local Authorities have different housing requirements and spatial strategies. West Berkshire Council's housing requirement and spatial strategy is set out in the Core Strategy (2006 – 2026). The Core Strategy sets out that up to 2000 dwellings will be provided in the AONB, and while there is a preference for brownfield land, Greenfield

sites will need to be allocated in order to meet the Council's housing requirement. The Core Strategy states that Thatcham will receive a limited amount of growth through the DPD to allow for a period of consolidation following a period of significant growth.

The Housing Site Allocations DPD is looking to allocate small scale development across the District's Settlement Hierarchy. Small scale development allows for shorter delivery times, therefore, helping to boost supply in the short to medium term.

Ribbon development would not be appropriate. Only a small part of HUN005 is considered acceptable for development in landscape terms. The acceptable area is located behind the garden centre and vets (HUN015 and HUN020).

The site promoter for HUN006 has suggested that access would come from Cottrell Close.

Comments regarding the use of less environmentally sensitive sites is noted, it is one of the reasons HUN007 is recommended for allocation over this site.

It is recognised that these sites are not adjacent to Hungerford itself. This is a consideration when considering the allocation of these sites.

Land use

Consultation comments:

- HUN005 should not be included as it is Greenfield and extends beyond the existing edge of the town, the other sites are brownfield
- Change of use requests for restaurants/pubs to residential needs to be questioned
- Description of previously developed land can be misleading, not all of this site is already developed
- WB housing needs can be satisfied by developing brownfield sites and underutilised industrial sites
- Site is largely brownfield (Garden Centre/Vet)
- Dispute that 70% of the development would be on brownfield land – would like to know how this has been calculated (*a figure quoted by the town council*)

Council response:

Where the Council are aware of suitable Brownfield sites, through the SHLAA, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy makes it clear that while there is a preference for the redevelopment of brownfield land, the allocation of Greenfield sites on the edge of settlement would be required to meet the Council's housing requirement. Sites within protected employment areas (PEAs) are not considered suitable for residential

development. PEAs will be reviewed as part of the new local plan, but until that time residential development on these sites is contrary to policy.

It is noted that this site contains a proportion of brownfield land, although both the Garden Centre and Vets are currently in use, and development of the site could result in the loss of these facilities and local employment opportunities.

Questions regarding comments made by the Town Council need to be directed to them. The 70% brownfield land figure is not a figure that the Council have used; this has been used by the Town Council.

Other sites

Consultation comments:

- Acceptance that some development is needed in Hungerford, but against development to both the north and south. Other sites
 - Meadowview site at the rear of Faulkner Square is a perfect location – wrongly excluded from the settlement boundary – should have no impact on the river Dun
 - Higher density housing could be built on the Oaks Bros site, providing 30+ dwellings would be perfect and nicely tidy-up the gateway to our town
- HUN014, 013 are infilling

Council response:

Meadow View and Faulkner Square are already within the settlement boundary so do not need to be allocated, any development here would be considered through the planning application process as there is a presumption in favour of development for sites within the settlement boundary. The Oaks Brothers site, and HUN013 and HUN014 are also within the settlement boundary, but are located within protected employment areas and therefore, development on these sites would be contrary to policy.

3. Ecology

Consultation comments:

- Proximity to River Kennet
- Special Area of Conservation (SAC)/Site of Special Scientific Interest (SSSI)
 - SAC due to presence of Desmoulin's Whorl Snail – very sensitive to changes in water levels
 - Development could impact the integrity of the site

- The Council would need to ensure appropriate avoidance and mitigation measures are implemented to ensure protected areas are not adversely impacted by development
- Urbanisation of the SAC/SSSI environment – a unique part of Hungerford's attraction
- Impact on Hungerford Town and Manor Fishery
- Impact on wildlife
 - Increased pressure for recreation
 - Reduced water quality
- Poor quality land unsuitable for agriculture (HUN006)
- Increased disturbance due to increased use of the areas along the river
- Soil erosion issues which could lead to landslides along the northern boundary of Cottrell Close

Council response:

The Council's Ecologist has been consulted on all preferred options sites. No significant concerns have been raised, there is potential for bat roosts within the existing buildings on HUN015 and HUN003 contains some old trees that should be retained, although they are not protected by Tree Preservation Orders (TPOs).

Consideration should be given to the proximity of the site to the SSSI/SAC, and Habitats Regulation Assessment (HRA) screening would be required at planning application stage.

The Landscape Sensitivity Assessment states that only a small portion of HUN005 is suitable for development, which means that the majority of the site would be retained as undeveloped land. All sites need to provide a degree of public open space, which can help to reduce the pressure on other areas of open space.

Any development on the site would need to take into account soil conditions and provide adequate protection against landslides.

4. Employment and economy

Consultation comments:

- Few local employment opportunities
- Loss of veterinary hospital and Garden Centre would mean people travelling further to access these services. Loss of employment
- Garden Centre may no longer be prepared to sell, as it is one of their most successful business sites (*not said by garden centre themselves*)

- Will not promote Hungerford as a town, people more likely to travel to Marlborough or Newbury along the A4

Council response:

There are a number of employment opportunities in Hungerford, and the Council are resisting development of non employment uses on protected employment areas such as Charnham Park, Station Road and Smitham Bridge Road, as this would be contrary to planning policy. It is recognised that a number of residents do travel from Hungerford to other places for work; however, there is a regular rail service from the town to the east and west, as well as a limited bus service all providing alternatives to car travel.

Development of the site would likely lead to a loss of the Garden Centre. The Vet itself is not included within the proposed site, so would be likely to remain.

The Garden Centre has not made any comments that would indicate they wish to withdraw their site from the Strategic Housing Land Availability Assessment (SHLAA)

5. Flood Risk

Consultation comments:

- Stormwater drains do not function effectively
- A4 drains failed to take away surface water recently
- Increased flood risk downstream – bridges, waterways unable to cope with additional run off during prolonged wet weather
- Higher flood risk here than at HUN007
- Concern over drainage ditch/balancing panel adjacent to Cottrell Close – already collecting a significant amount of water

Council response:

The site is not within an Environment Agency flood zone, and is not at risk from surface water flooding. A flood risk assessment would need to be provided at planning application stage and would need to consider all sources of flooding and set out mitigation measures, including Sustainable Drainage Systems (SUDs) to ensure water generated on the site is dealt with on the site.

6. Heritage

Consultation comments:

- Requirement for archaeological assessments should be included in the DPD requirements unless carried out prior to the submission of the DPD
- Loss of local historic significance

Council response:

The site assessments make it clear that further archaeological assessment would be required on the site. This would be set out in the site policy if the site was to be allocated.

7. Highways and Transport

Access

Consultation comments:

- Separate accesses should be provided so the sites can be developed independently of each other
- Access should be on to the A4, not Cottrell Close
- Access road should incorporate suitable traffic calming measures

Council response

Details of specific access arrangements would be dealt with at planning application stage. It is unlikely that access would be provided via Cottrell Close.

Parking

Consultation comments:

- Lack of parking in the Tesco Car Park
- Parking issues in central Hungerford
- Need for additional parking at railway station

Council response:

It is noted that is pressure on parking in Hungerford.

Public Transport

Consultation comments:

- Existing bus service
- Walking/cycling distance to the railway station

Council response:

The site is approx. 1.4km from the railway station, which is within the acceptable walking distance for commuting and travel to school set by CIHT (2000) of 2km.

Limited bus services pass the site, with the main bus route linking Hungerford to Marlborough, with a single daily service to Newbury. Development of the site could provide opportunities to improve the local bus service.

Road safety and walking/cycling

Consultation comments:

- Not within walking/cycling distance of schools/leisure facilities (both to south of Hungerford)
- Improvements to pathways/walkways required – currently poor
- Better access to facilities in town centre as no need to walk/cycle up hill
- Impact on safe routes to schools
- Lack of safe crossing points on A4 to get to town centre
- Pedestrian crossing/bridge to A4 would be required as well as a safe crossing in Bridge Street
- Too far for most people to walk to school meaning more traffic travelling up the high street to school

Council response:

The site is 1.7km from the primary school, which while within the acceptable walking distance for school, is unlikely to encourage parents to walk their children to school. It is 2.5km from the site to the secondary school and leisure centre, which is above the acceptable walking distance for school, meaning that there is a high likelihood that parents will drive their children to school as there are no alternatives in terms of public transport. The distance is below the threshold for free home to school transport to be provided (3 miles) and the route is likely to be considered safe as there are pavements the whole way.

There are pavements, albeit narrow ones, throughout Hungerford.

Additional road safety improvements would be considered as part of any planning application submitted for the site.

Traffic/congestion

Consultation comments:

- Already been increased traffic using the only north/south route through the town (High Street)
- Development should be located to the north of the A4 to reduce the traffic impact through the Town Centre
- Southern sites will cause least traffic disruption – traffic will feed onto A338, which is not a major trunk route
- Northern sites will feed onto A4 – this is already busy
- Impact on the Bear mini-roundabout from traffic on the A4 – several near misses have occurred here
- 30mph speed limit is not obeyed
- Development likely to increase car journeys to school down the high street
- Poor visibility across A4
- Car dependent community, encouraging out-commuting for shopping to Newbury/Marlborough
- Traffic calming along the A4 required
- Majority of people leave Hungerford for work, therefore, reduced impact on congestion in town centre if development located to north
- On the approach and take-off path of an airfield
- Provides good access to the M4/A4 to Newbury and Marlborough
- Does not impact on the High Street
- Access to the town centre and services/facilities requires crossing 3 roundabouts and travelling up the High Street
- Increased congestion from A4 and those wishing to access services/facilities within Hungerford town centre
- Congestion in the high street usually occurs when lorries are making deliveries
- School traffic from the site is likely to exceed traffic that would be generated should development take place to the south
- Charnham Park by-pass for the A4 would be a good idea
- Traffic flow through the town likely to be less from the northern sites – school traffic will not be anywhere nearly as severe as commuter / shopping trip traffic from the south
- Could John O’Gaunt School bus collect Eddington children on the way past?
- Easy access to A4 for other locations (for employment/sporting activities/recreation/facilities at Charnham Park) without needing to go through the town centre

- Major area of out-commuting

Council response:

The Council's Highways Development Control Team has not raised any concerns regarding the development of this site. Details of any highways improvements needed would be considered at planning application stage through a Transport Assessment.

While the Council do not have transport modelling for this area an assessment has been carried out looking at travel to work patterns and potential journeys to school. This indicates that the traffic impact from HUN007 would be less than the impact from these sites.

Given the distance from the sites to the local schools, and current travel to school patterns, it is likely that parents would drive their children to school from these sites, which would increase traffic along the High Street, especially if after dropping children off parents return to the north either to access the A4/M4 or simply to return home.

It is unlikely that the John O'Gaunt school bus would have the capacity to collect children from Eddington on the way past. Council provided transport, which is available free to some pupils, does not usually have additional capacity to take fare paying passengers.

8. Infrastructure

Consultation comments:

- Development here should be considered separate from Hungerford and appropriate infrastructure provided (school, shop, surgery)
- Seems reasonable to ask developers to provide some public open space and potentially some small community meeting facility given the size of the development
- The local supermarket is too small to cope with existing demand, let alone additional demand from more residents
- Infrastructure will not cope with further allocation/housing requirements

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be

updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Education

Consultation comments:

- Potential that WBC could be liable to provide home to school transport due to distance to schools
- Poor relationship to schools
- Site should be with walking distance of schools
 - Southern site is a 10min walk from the school
 - Northern sites are a 45min walk, with no safe route
- Need more pupils at John O'Gaunt
- What provision for additional primary school places?
- Nursery/playgroup places?

Council response:

The current education plan for Hungerford is to expand the existing primary school to meet current demand. However, the Local Education Authority would like to see part of the site safeguard for education provision. The allocation of school places is subject to the School's admissions policy.

The site is adjacent to the secondary school and less than 1km from the primary school; therefore, the majority of pupils should be able to walk to school.

Leisure Facilities

Consultation comments:

- Poor relationship to leisure centre

- Loss of retail and service amenities used/appreciated by the community (Garden Centre, Vets)
- Closer to shopping area of Hungerford

Council response:

It is noted that the site has a poor relationship with the leisure centre which is 2.5km from the site.

Development of the site would likely lead to a loss of the Garden Centre. The Vet itself is not included within the proposed site, so would be likely to remain.

The two preferred options sites are roughly equidistance to the main shopping area of Hungerford.

Utilities

Consultation comments:

- Sewage system in the north of the town is working over capacity.
- New sewage/drainage system would be required
- Impact on water quality
- Presence of 2 oil pipelines through the site

Council response:

Thames Water has been consulted on the sites. They have raised concerns regarding water supply and waste water services in relation to development of the site. Water supply and waste water infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. A water supply and drainage strategy would be required.

The proximity of the site to the Kennet and Lambourn SSSI/SAC means that consideration of water flows would need special consideration. This is an additional consideration that HUN007 does not have, and while it does not prohibit development on the site, there could be an impact on the short term delivery of the site.

The presence of the oil pipeline through the site will require a buffer zone, which will impact on the design of the site, as access to the pipeline is required at all times. The presence of the pipeline has the potential to impact on the developable area of HUN005. The site promoter/developer would need to consult the Oil Pipeline Agency to establish the exact location of the pipeline.

9. Landscape/setting

Consultation comments:

- Impact on the AONB
- Views from Hungerford Common/Coombe Gibbet
- Development in the AONB should favour brownfield sites such as this
- Good access to the countryside
- Less impact on AONB than HUN007 – set out in LSA
- Poor relationship to Hungerford
- Loss of area where people can walk without housing being visible
- The site is barely visible from Hungerford Common and is screened by trees and hedging
- There will be no loss of views by existing residents of Cottrell Close as they do not have views at the moment
- Impact on the AONB can be mitigated
- Hungerford is built on a rise and is visible from the surrounding area, it is difficult to identify any development that does not have some visual impact
- Visual impact from Cemetery not taking into account
- The site would be visible every time you drive along the A4 (unlike HUN007 which is invisible unless you are in the immediate vicinity of the school)
- AONB – LMS comments from Core Strategy on SHLAA sites
- Good access to canal path and Freemans Marsh
- Why is HUN022 not recommended? Similar issues as HUN007. Why has the landscape justification been ignored for HUN007?

Council response:

The Landscape Sensitivity Assessment (LSA) (2011) carried out on the site indicates that development on southern and western parts of the sites would be acceptable, subject to certain mitigation measures. Mitigation required includes careful siting and the retention of boundary planting. It is important that the whole site is not developed as one homogeneous layout and form. Development would need the appearance of incremental growth in small areas with respect for street frontage and views from Hungerford. The visibility of each site, from a number of view points, has been considered in the LSA, including HUN006 from the cemetery and the whole site from the A4.

A Landscape Visual Impact Assessment (LVIA) would be required to accompany any planning application for the site, which would need to set out the details of the mitigation measures to be provided.

The SA/SEA automatically excludes sites on landscape grounds where the Landscape Assessment states that development on a site would not be acceptable.

Landscape Assessment has been carried out for all sites within the AONB. These assessments state whether development on a site is suitable given the location within the AONB. For both HUN022 and HUN007 part of the site is considered acceptable for development. The area of HUN022 considered suitable for development is located to the north of the site. The proposed access to the site is located to the south of the site, outside the area of the site considered suitable for development, therefore, there are concerns regarding access to the site without the development of other adjacent sites. The LSA also states that there should be no physical or visual link between HUN007 and HUN022, therefore, the development of both sites could lead to a significant negative impact on the AONB. HUN022 is also less well related to the existing settlement than HUN007 due to the presence of the water works to the south of the site, which separates the site from the existing settlement.

10. Personal

Consultation comments:

- Extra housing will have a detrimental effect on quality of life

Council response:

Comments noted.

11. Pollution

Consultation comments:

- Water pollution could impact on the water quality of the Kennet (and impact on fish/ecosystems)
- Light pollution – impact on fishing along river Kennet

Council response:

The site is adjacent to the Kennet and Lambourn SSSI. There could be some impact on the SSSI, which would need to be considered at planning application stage.

Details of lighting would be provided as part of any planning application for the site. Details would need to be in line with the Council's Quality Design Guidance on street lighting.

12. Settlement boundary

Consultation comments:

- The town boundary should not be extended
- Extending the settlement boundary along the A4 would be contrary to the WBC adopted town plan for Hungerford
- Lack of clarity concerning extent of redrawing town boundaries
- HUN005 should not extend beyond the eastern most point of the existing settlement boundary to avoid ribbon development

Council response:

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

The settlement boundary review criteria were consulted on as part of the preferred options consultation. The final proposed settlement boundary changes will be consulted on as part of the proposed submission version of the DPD in autumn 2015.

The Landscape Sensitivity Assessment (LSA) indicates that only a small part of HUN005, in line with the Garden Centre boundary to the east and no further north than the existing settlement boundary of Eddington would be acceptable for development.

13. Comments from the Parish Council

- Support allocation of this site
- Reservations at the amount of land at HUN005. 0.65ha would be more appropriate as boundary would then extend no further than the existing garden centre boundary. The settlement boundary would not extend further north up the slope, due to impact on the landscape
- 70% previously developed land which will have much lesser impact on the AONB

- Less impact on traffic flow through Town Centre, which is in a conservation area with sensitive environmental receptors

Council response

The site area for HUN005 is restricted by the Landscape Sensitivity Assessment, with the eastern most boundary in line with the eastern edge of the garden centre and the northern most boundary being in line with the existing development at Cottrell Close. This gives a site area of 1.7ha.

While a portion of the site is brownfield land, is it not 70% of the site. The whole developable area of the site is just under 4ha, HUN020, HUN003 and HUN015 have elements of brownfield land, totalling 1.53ha. Therefore, approximately 38% of the whole site could be considered as brownfield.

Transport assessment work carried out by the Council indicates that, based on current travel to work/school patterns, development of this site is likely to have a greater impact on traffic through the High Street than HUN007.

14. Comments from the site promoters

HUN006

- Support for allocation, either as a standalone site for 9 dwellings, or as part of a wider site
- The site performs well as a standalone site
- Adequate vehicular access can be obtained off the Cottrell Close cul de sac and can be obtained independently of the adjacent preferred sites
- It is well located for access to services, community facilities etc.
- Little harm to the AONB mentioned in the Site Commentary
- Visually and physically contained
- Inclusion of the site within the settlement boundary would also be in compliance with the proposed settlement boundary criteria

Council response:

Additional landscape work carried out following the Preferred Options consultation, in response to comments made by Land Management Services on behalf of the North Wessex Downs AONB, states that the site would only be suitable for low height, low density development, with substantial landscape buffers and mitigation.

The Council's Landscape Assessment indicates a preference for the sites to be developed individually, the appearance of incremental growth in small areas with respect for street frontage and views from Hungerford is key to minimising the impact

on this part of the AONB. It is noted that the whole site area is considered acceptable for development in landscape terms.

It is noted that the site could be delivered as a standalone site for 9 dwellings or part of a wider site allocation and that access to the site can be obtained off Cottrell Close.

The site is close to local services and facilities, with the exception of education provision and the leisure centre. The primary school is 1.6km from the site, with the secondary school and leisure centre 2.4km away. However, access to services and facilities in the town centre involves walking along the A4 and crossing the river and canal, both of which can act as a barrier in encouraging people to consider walking or cycling.

Unless the site was allocated for development it would not meet the settlement boundary review criteria.

HUN005

- Disappointed developable area has been reduced so housing only built directly behind the Garden Centre – the site remains viable for development, but does require access from the A4
- HUN005 and HUN006 are the only parts of the site where development can start immediately as the other sites have existing uses
- Access road proposed as close the Garden Centre as visibility sight lines allow (Diagram attached – believe this has approval from the Council's Highways dept)
- Prepared to fund a Traffic Regulation Order to extend the 30mph speed limit eastwards to include the proposed site with an associated 40mph buffer
- Access to the other sites (HUN003, 006, 015, 020) could be created if these sites were to come forward for development. Agreements would be entered so that no random demands could be made on the other landowners
- Some land would be offered as open space (to the east of the developable area) which would also offer a buffer to the open countryside
- The estate is prepared to consider giving land to the LEA so that a new primary school could be built to the north of the town
- Traffic study carried out in 2011 – traffic impact on the high street from development to the south would be greater development to the north
- Should the site be allocated/developed the Chilton Estate would wish to retain some of the new housing in its ownership for rent

Council response:

The Landscape Sensitivity Assessment landscape assessment has set the developable area of the site, based on what would be acceptable within the landscape. Since the preferred options additional landscape work has been carried out on the site, following comments made by Land Management Services on behalf of the North Wessex Downs AONB, which has further reduced the acceptable developable area of the site to be in line with the existing development at Cottrell Close and immediately north of HUN003, 015 and 020, and restricts development to the north to be in line with the existing Eddington settlement boundary. The proposed access to the site is not included within the area considered acceptable for development; therefore, access to the site would rely on the allocation and development of another site within this group of sites.

It is noted that the site promoter would be prepared to fund a traffic regulation order to extend the existing 30mph speed limit zone.

It is noted that existing land uses of other parts of the wider site could limited the availability of the sites in the short term. However, the landscape assessment asks that the sites are developed independently, rather than as a single mass development, so this would not impact on the overall allocation of the site, rather it would impact on the phasing of development.

Open space requirements would need to be provided within the developable area of the site, in line with the Council's open space policy RL.1 of the West Berkshire District Local Plan 1991 – 2006 (Saved Policies 2007).

It is noted that the land could be offered to the LEA for a new primary school.

The transport appraisal carried out by i-Transport in 2011 estimated development of 330 dwellings to the south of Hungerford (HUN007 at 250 and HUN022 at 80 dwellings) with 100 dwellings to the north (HUN004 at 24 dwellings and HUN005 at 76 dwellings). This assumes three times more development to the south than the north, therefore, is it not surprising that it is estimated that traffic from development to the south would be significantly higher than development to the north. The Housing Site Allocations DPD is only look to allocate approximately 100 dwellings in Hungerford, meaning that the traffic impact from the North or South would be based on a similar number of traffic movements. The Council's transport assessment work, indicates that development to the south would be likely to have less of an impact on traffic on the High Street than development to the north, due to current travel to work/school patterns, and the distance to the schools being such that it is unlikely to encourage walking or cycling, increasing the number of children driven to school.

It is noted that should the site be allocated the Chilton Estate would like to remain some of the new dwellings in its ownership for rent.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Hungerford Rejected Sites

HUN001: Land at Smitham Bridge Road

Responses received: 5

1. General

Consultation comments:

- Should follow the Plan of the Town Council as this spreads the impact of development across Hungerford
- HTC comments are not consistent with previous policy or guidelines from the Town Plan or local residents views. It ignores the landscape study findings and underestimates the amount of housing the PO sites could provide. They have omitted HUN006 altogether

Council response:

The Hungerford Town Plan is taken into consideration, alongside the other consideration and planning restrictions. If the Town Council would like more control over future development then a Neighbourhood Plan could be considered.

Comments regarding the Town Council's response should be directed towards the Town Council.

2. Principle of Development

Consultation comments:

- The site has been rightly rejected
- The settlement boundary should not be moved
- New development has already taken place at Penny Farthing Close
- The reasons for rejection of this site are not accepted by the TC
- Housing next to the trading estates would function well
- Density is not in proportion to other areas of the country – will result in higher densities in practice

Council response:

Support for rejection of the site is noted.

The site does not meet the criteria for the settlement boundary review, and therefore, cannot be included in the settlement boundary at this stage.

Penny Farthing close is on the south side of the railway line, therefore, does not involve crossing the railway line. Just because a site is outside the settlement

boundary does not mean that it would not get planning permission. The development at Penny Farthing Close was a rural exception site, providing 100% affordable housing.

The Council are concerned about access to the site, and the impact of the industrial estate on residential development. These are factors which are not an issue for the other preferred options sites, and therefore, the other sites are preferable over this site for allocation. The industrial estate has also been submitted to the Council for consideration as a housing site. It is currently contrary to policy as it is in a protected employment area, should it ever be considered suitable for development at a point in the future, comprehensive development of both sites (whether physically together or not) would be preferable.

Standard densities are used for all sites across the AONB, this is lower than the densities used elsewhere in the district (20dph rather than 30dph).

3. Flood risk

Consultation comments:

- No history of flooding on the site
- The site does suffer from flooding

Council response:

A water course runs along the eastern boundary of the site, with a small area of the site in flood zones 2 and 3 and within an area of risk of surface water flood risk. A flood risk assessment would be required should the site ever be allocated. The site promoters have indicated that the area within the flood zone would not be included within the developable area of the site and SUDs would be provided.

4. Highways and transport

Consultation comments:

- There is a right of way along the edge of the site that should not be moved
- Traffic congestion would occur at the following junctions
 - Church Street/Smitham Bridge Road
 - Church Street/High Street
- There are no traffic management schemes in place
- There is no additional capacity in Smitham Bridge Road for additional traffic – this is a narrow country road

Council response:

Should development ever take place on the site it would need to take into account the right of way, either by preserving it where it is, or providing a suitable diversion. The details of this would be covered at planning application stage.

The Council has concerns regarding the access to the site. Should the site ever be recommended for allocation transport assessment work would be required to show that adequate access could be provided to the site.

5. Landscape/setting

Consultation comments:

- Separated from the countryside by a hedge
- Isolated from the AONB
- The Landscape Study states the site is the only area on this side of Hungerford that would be suitable for development, however the site is visible in the landscape
- Development would impact on the AONB
- Screened from the AONB

Council response:

The Council has had landscape assessment work carried out for all sites within the AONB. The recommendations from these assessments have been taken into account when recommending which sites should be allocated for development. Where the Landscape Assessment has said that a site is acceptable for development, a series of recommendations have been made for mitigation measures that would need to be provided.

6. Pollution

Consultation comments:

- The adjacent industrial area is noisy and experiences regular HGV deliveries
- Existing dwellings in the area at 40+m from the industrial area so do not have the same noise issues
- The site should only be considered if there is need for significantly more houses in the area and an alternative industrial estate site can be found
- The site is close to existing development and the trading estate
- Overhead power lines cross the site, likely that an underground diversion would be provided

Council response:

It is noted that the site is adjacent to the industrial area, this is one of the reasons the site has not been recommended for allocation.

Any reconsideration of protected employment land will take place as part of the new local plan following an updated employment land assessment. Currently there is not a surplus of employment land in West Berkshire, so it is not appropriate to recommend the loss of employment land for residential development.

Overhead power lines do not preclude development, although do need to be taken into consideration at design stage.

7. Comments from the site promoter:

General

- Disappointed the site is not included as a preferred option
- Refute the reasons given for rejection of the site – are considered weak
- All reasons for rejection can be mitigated against
- No environmental/technical issues regarding the development of the site
- Not allocating the site is no representative of positive, proactive planning as encouraged by the NPPF
- Allocation of the site would be fully aligned with the Localism Act 2011
- The site is partially underlain by gravel – this would be considered at planning application stage
- There is no contamination
- The site is Greenfield
- In single ownership
- Existing strong relationship to the settlement

Principle of development

- The site is suitable and in an appropriate location for modest housing development
- The approach taken to allocations in Hungerford is not the most appropriate strategy for Hungerford
- Clear support from the Town Council for this site
- The site should be allocated for 35 dwellings (20 – 30dph), 2 – 4 bed dwellings
- Site promotion document states site would be for approximately 57 dwellings (30dph) and elsewhere in the document 35 dwellings.
- The site is consistent with views of the community and the Town Plan
- No objections to the numbers proposed for allocation in Hungerford, just the distribution

Council response:

The Site selection forms all state a development potential of 26 dwellings on the site (1.31ha at 20dph). The Preferred Options DPD itself in the rejected sites section for HUN001 gives a development potential of 26 dwellings

Development in conjunction with HUN008

- There is no certainty that the trading estate (HUN008) will come forward for housing, therefore it is contrary to policy not to allocate this site based on the potential for another site to be developed. There are multiple landowners, and questions over viability (would need to be high density and free from affordable housing commitments for housing development to exceed current use value) Potential for over 55s development on the site.

- The 2 sites should come forward in isolation from each other, especially as it would not be possible to bridge the river and combine the sites
- Does not appear to be any technical work to demonstrate the two sites working together

Community Benefit

- Should this site be allocated a long term agreement would be made with the Town Council to continue to provide allotments at HUN011 (currently under lease until April 2016). This agreement would be included in any planning permission to provide community benefit

Highways and transport

- Walking distance to town centre/railway station – improved route as a new footpath has been installed on the north of North Standen Road
- Footpath link to existing residential development would be provided
- The road is wide enough for 2 way traffic
- The existing road layout helps to reduce traffic speeds as there is reduced visibility
- Adequate visibility splays for the speed of traffic can be provided
- Development would not generate significant traffic movements
- Good access to public transport
- Access likely to be achieved from north-west corner of the site on North Standen Road by creating a new access to Penny Farthing Close. Would be directly opposite Marsh Lane, which is not considered ideal
- Separate pedestrian access could be provided directly onto Smitham Bridge Road
- A transport appraisal has been carried out (based on 35 dwellings on the site)

Landscape/Setting

- Good access to public open space and the Canal
- Adjacent to area of employment
- Landscaping mitigation measures would be provided in line with the Council's landscape assessment
- The site assessment forms in relation to landscape impact are contrary to the Landscape Assessment conclusions for the site
- The site is shown to have the lowest impact on the AONB of all sites
- The site would form a discrete and distinct parcel of development as advocated by the LSA
- A landscape buffer would be provided to the southern boundary

Ecology

- Mitigation /enhancement measures would be provided to ensure no impact on the SSSI (Freeman's Marsh)
- Site is close to a BOA
- Recommendations from the Habitat Survey
 - A biodiversity enhancement plan should be incorporated into the landscaping scheme of any proposed works
 - Native hedgerows should be retained
 - Woodland/trees should be maintained

- The water course needs to be protected
- Potential for bats on the site – full survey required
- Potential for Water voles/otters – survey of the adjacent canal and river required
- Vegetation removal should not take place during bird nesting season
- A reptile survey should be carried out
- Any excavations to be left over night should be covered or fitted with mammal ramps
- Non native species should not be spread

Flood Risk

- Low flood risk on the majority of the site (FZ1) with a small strip of land adjacent to the river in FZ3 – this area would be maintained as open space
- Other sites put forward have flood risk, and yet this site has been rejected. Mitigation could be provided against the flood risk on the site.
- Development in FZ3 would be avoided and the area used for open space or ecological enhancement
- There is no evidence of groundwater flooding on the site
- SUDs to be provided

Supporting documents submitted:

- Flood Risk and Surface Water Drainage Appraisal
- Transport Appraisal
- Preliminary Ecological Assessment

Council response:

It is reasonable to seek a more comprehensively planned development to the west of Hungerford if there is a requirement in the longer term for additional development. There remain concerns regarding access to the site. Smitham Bridge Road is a narrow single carriageway country lane as it approaches the site. The access to either of the other preferred sites is from a main road, therefore, achieving appropriate access, and limiting the impact on the immediate road network is easier.

HUN002: Land at The Paddock, Marsh Lane

Responses received: 2

Consultation comments:

- Allocation of the site is supported by the TC
- Planning permission grant in 1996 for a house adjacent to the site, outside the settlement boundary.
- Request to be considered within the settlement boundary
- Adequate vehicle access could be provided by upgrading the road
- Landscape Assessment indicates that the site is perceived to be merged with the town

Council response:

The Parish Council have not made reference to supporting the allocation of this site in their consultation response.

The site was assessed as “not currently developable” in the SHLAA due to access issues and the potential impact on the Landscape. Access to the site is a significant constraint due to the nature of March Lane. Sites assessed as “not currently developable” in the SHLAA were automatically excluded from consideration in the HSA DPD.

Planning applications are considered on their own merits and assessed against the policies of the time. While development outside the settlement boundary is contrary to policy, there can be instances, where there are material considerations required which can result in planning permission being granted.

The site would not meet the settlement boundary review criteria and therefore, cannot be included within the settlement boundary.

There is limited scope to improve the access due to the rail bridge which restricts the width of the road.

A Landscape Assessment has not been carried out on the site itself.

Comments from the site promoter

General

- The allocation of sites should wait until the SHMA is released as the Core Strategy numbers are out of date and fail the tests of soundness set out in the NPPF/NPPG
- The SA does not show any significant constraints
- Subjective methods, not based on evidence have been used to reject the site which is not a robust assessment process.

Principle of Development

- The SHLAA assessment has changed – 2009, considered potentially developable for 10 units, 2011/2013 not developable – landscape and access issues. There has been no opportunity for consultation and submission of further information to overcome issues on the SHLAA
- Long planning history on the site, but planning policy has changed – there is now a presumption in favour of development
- ADDP5 of the Core Strategy states that Hungerford is larger than Lambourn and has a more significant function, therefore should have more development than Lambourn
- More dwellings need to be allocated in the AONB to meet the requirement – there should not be such a reliance on windfalls
- Additional sites should be allocated, especially in Hungerford
- Site considered suitable for 6 dwellings or an extension of the settlement boundary
- Marsh Lane should be used as the settlement boundary
- Question decision to allocation development in smaller villages rather than Hungerford – this is not the best spatial strategy and this site outplays many other of the Preferred Option sites therefore, the plan is unjustified and unsound

Parish Council support

- The site does not appear to have been part of the Parish Council consultation event in Jan 2014 – why not?
- Hungerford TC only refer to HUN011 in their response, which is incorrectly identified as HUN001
- There is no reference to the Town Council comments in appendix D – would like clarity on the TC position

Landscape/Setting

- Landscape and access issues can be overcome
- There is already development to the west and east of the site
- The site is not visible outside Marsh Lane – Landscape Sensitivity should not be a reason for rejection. The site needs to be assessed individually not as part of a general assessment
- The site is perceived to merge with the Town in landscape terms
- The Eddington sites are physically removed from Hungerford

Highways and transport

- Highway improvements – widening Marsh Lane proposed, with provision of designated parking bays for recreational purposes, or introduction of priority shuttle on either side of the rail bridge, with traffic leaving the site having priority
- Benefits of reducing traffic speeds
- Potential for provision of pedestrian footway
- Improved visibility
- Modest number of dwellings with limited traffic impact

Pollution

- Noise concerns are not justified, these would be dealt with at planning application stage

Council response:

The Council's SHMA was published in October 2015. The Housing Site Allocations DPD looks at allocating the remaining of the 'at least' 10,500 housing figure from the Core Strategy, with some additional flexibility. A new Local Plan to look to the longer term will be prepared once the DPD has been adopted.

The SA/SEA is a decision aiding tool, it will not necessarily rule a site out, and many sites will have a similar result from the assessment. In this case other factors are taken into account, which may not have been picked up in the SA/SEA. In the case of this site, access is considered to be a significant constraint to development, but this would not be picked up in the SA/SEA.

There is more housing proposed for Hungerford than for Lambourn, reflective of their size, roles and function.

The windfall allowance used for the AONB is based on past levels of windfalls received; therefore, it is considered that this is an appropriate figure to use. The impact on the landscape character of the AONB is paramount when considering housing numbers in the AONB; therefore, the Core Strategy places an upper limit on the number of dwellings to be built in the AONB.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, through the Settlement Hierarchy. The Core Strategy was found sound at an Examination by an independent Inspector who agreed that based on the evidence provided the settlements within the AONB would be able to take the amount of development proposed. Hungerford and Lambourn are both Rural Service Centres, and therefore, should be able to take similar levels of development.

Parish Councils were consulted on sites which had been assessed in the SHLAA as "potentially developable" as this site had been assessed as "not currently developable" it was not included within the consultation workshops.

A formal landscape assessment has not been carried out for this site, as the site was assessed as not currently developable in the SHLAA.

Access to the site is a significant concern, especially as there is limited potential for improvement due to the location of the railway bridge.

Noise concerns as a result of the proximity to the railway are justified, but it is recognised that assessments would be carried out at planning application stage.

HUN004: Former Eddington Allotments

Responses received: 1

Consultation comments:

- Site rejected on environmental impact
- Lower density development might be ok
- Potential for some of the site to be returned to allotments, of which there is a need in Hungerford

Council response

The site was assessed in the SHLAA as “not currently developable” due to the poor relationship to Hungerford and the potential impact on the landscape character of the AONB. The site is also adjacent to a SSSI, which could be negatively impacted on by development on the site.

The provision of allotments on the site would be down to the landowner, and would need to be supported by the Town Council.

HUN023: Oakes Bros Site

Responses received: 2

Consultation comments:

- The site is brownfield
- Close to the town centre
- Higher density could be provided on the site
- TC see the site being redeveloped as part of the Rail Station Development Plan

Council response:

The site is within the settlement boundary, although is within a protected employment area. The Council are not looking to allocate sites within the settlement boundary as there is a presumption in favour of development. However, for this site, development of the site would be against current planning policy as it would result in the loss of land within an area designated for employment uses.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Kintbury General Comments

Responses received: 4

1. Principle of development in the village

Consultation responses:

- Support for the overall approach taken to Kintbury
- Support for the preferred option put forward
- Opposed to the principle of any new development as considers that Kintbury has already provided 'its fair share' to cover the plan period
- Considers that any development outside the current settlement boundary will inevitably cause harm to the AONB

Council response:

The mix of both supportive and negative comments is noted.

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Kintbury as a service village within a Settlement Hierarchy. This means that Kintbury along with the other service villages has a limited range of services and has some limited development potential. As such, it is expected that Kintbury will accommodate some additional housing growth to 2026.

In order to assess the harm to the landscape of the AONB each site with potential for development must be considered on its merits. This has been done through the preparation of a Landscape Sensitivity/Capacity Assessment (LSA) where each site has been tested to see if development would result in harm to the natural beauty and special qualities of the AONB. Great weight has been attached to the conservation and enhancement of the AONB as part of this process. The LSA identifies sites that could potentially be developed without harming the landscape subject to further detailed landscape and visual impact assessments and provided design, siting and green infrastructure requirements specified for each site are met. The LSA rules out sites where the harm is demonstrable.

2. Infrastructure

Consultation responses:

- Recommend that we liaise with Thames Water to ensure that the impact of new development and any upgrades that may be required to the sewer network are understood, either through the production of a drainage strategy or the provision of a connection to the sewerage system at the nearest point of adequate capacity
- School is at capacity
- The current facilities and services in the village, particularly the Doctors' Surgery are already stretched and any further development will have a deleterious effect on the current services as the surgery cannot be extended.
- The direct rail link to Paddington is under threat with the electrification of the line to Newbury and consequently the likelihood that only a shuttle service will operate from Bedwyn via Hungerford and Kintbury and this shuttle service will only have limited connections to the fast service from Newbury. There will, therefore, be a strong likelihood that further development within the Village will create a significant increase in car movements from Kintbury to Newbury on top of the increase emanating from the current properties, because commuters will seek to travel by car to a point where a regular fast service will be available.

Council response

Comments noted.

Existing pressure on some local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Following the introduction of electric train services from Newbury anticipated in May 2017, it is acknowledged that there will be a reduction in the number of through services between Bedwyn/Hungerford/Kintbury and Reading/London. There will be a diesel unit shuttle train service between Bedwyn & Newbury which will provide a

connection with the new electric units at Newbury. We understand that there will be one through peak service in each direction. The Department for Transport has expressed a desire to work with the rail industry to find a solution which would see through services to Bedwyn/Kintbury/Hungerford established at levels similar to today.

3. Traffic and Road Safety

Consultation responses:

- Inadequacy of and impact on street scene with its narrow roads, pavements and houses close to the road
- Impact on volume of traffic through the village, but especially in the Conservation Area, from all the shortlisted sites
- Impact on traffic

Council response

The distinctive nature and particular character of Kintbury is recognised and in accordance with Core Strategy policy CS19 will be conserved and enhanced in any future development.

The traffic generated from the level of development proposed for Kintbury is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

KIN006 and KIN007: Land to the east of Layland Green, Kintbury

Responses received – 17

1. Principle of development

Consultation comments:

- Opposed to the principle of any new development in Kintbury
- Opposed to the principle of any new development outside the settlement boundary of Kintbury
- Opposed to the principle of any new development in the AONB
- More housing should be built on brownfield land
- Development would be contrary to policy ADPP5 as it would not conserve or enhance the AONB
- Development of this size would change the character and appearance of the area – the site would suit a smaller development of 2-3 houses only
- Concern about impact on house values
- Considers KIN004 is more appropriate as it is closer to the railway station, there would be less impact on traffic through the village and it is not vulnerable to flooding

Council response:

Comments noted. The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The role of the strategy is to achieve an appropriate balance between protection of the District's environmental assets and improving the quality of life for all, ensuring that necessary change and development is sustainable in the interests of future generations. Not all development can be accommodated within the District's urban areas, and this would not be the best approach to meeting housing needs across West Berkshire as a whole. However, urban development will be maximised.

The Core Strategy outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. The spatial strategy builds on the existing settlement pattern, with a particular focus on Newbury as the District's administrative centre and on other sustainable urban areas. The aim is to maintain a network of sustainable communities, meeting the needs of communities while protecting and enhancing the environmental assets of the District. Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Kintbury as a service village within a Settlement Hierarchy. This means that Kintbury along with the other service villages has a limited range of services and has some limited development potential. As such, it is expected that Kintbury will accommodate some additional housing growth to 2026

There were a number of sites in Kintbury promoted as part of the Strategic Housing Land Availability Assessment (SHLAA) process. Of these, nine (one site was subsequently withdrawn), including KIN004, were considered to be potentially developable with choices to be made through the plan led process. The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Environmental Report sets out in full how this decision was made.

2. Biodiversity

Consultation comments:

- Opposed to the principle of any new development near ecologically sensitive sites
- Impact on the variety of wildlife (including protected species) and their habitats
- Impact on wildlife and natural environment from destruction of woodland habitat
- Local Wildlife Site adjacent with Great Crested Newts. It is likely that they will be using this site as well; therefore appropriate avoidance and mitigation measures will need to be implemented to ensure that development will not kill injure or disturb them.
- Appropriate wildlife surveys will need to be undertaken
- The site provides a habitat for Great Crested Newts and possibly other protected species and therefore appropriate avoidance and mitigation measures will need to be implemented
- Particular concern about disturbance from people and dogs on the nearby SSSI and the Local Wildlife Site adjacent with Great Crested Newts
- Concern over the use of the term 'Biodiversity Opportunity Area'

Council response:

Comments noted. The site lies very close to a Local Wildlife Site which is also a BBOWT nature reserve (Kintbury Newt Ponds) and which hosts a large breeding population of Great Crested Newts. The Council's Ecologist does not consider that the fields are BAP habitat, but, being grass, could be a good Barn Owl feeding area. Local environmental records indicate that Great Crested Newts are using the area around the site so it may be possible that they are also using this site in their terrestrial phase. An extended Phase 1 habitat survey would be required and all ponds within 250m to the south and east of the site surveyed for Great Crested Newts. Appropriate avoidance and mitigation measures would then be implemented in accordance with Core Strategy policy CS17. For example, the pit in the north of the site (in KIN007) could be developed into a permanent pond as part of a SuDS scheme and a corridor left for newts along the northern boundary.

The site is within a Biodiversity Opportunity Area and so the Council will pursue net gains for biodiversity in accordance with Core Strategy policy CS17. BOAs do not represent a statutory designation or a constraint upon development; rather, they are the areas where biodiversity improvements are likely to have the most beneficial results at a strategic scale.

3. Flooding

Consultation comments:

- Flooding – very thick layer of clay means the surrounding area is liable to flooding from surface water.
- Flood prevention measures will need to be considered as part of any new development
- The site (including the pond) acts as a natural buffer at present.
- Flooding – existing surrounding properties have previously flooded and some have had to be underpinned.
- Area of former clay pits. Existing properties have suffered from subsidence, which would need to be considered as part of any new development
- Houses will be vulnerable to flooding from surface water run off and subsidence due to area being former clay pits
- The surrounding area will be prone to surface water flooding from any new development
- Natural ground instability as thick layer of clay swells when wet and shrinks when dry will mean the site will be less viable, with the consequent impact on the provision of affordable housing

Council response:

Comments noted. The site lies within the Environment Agency's groundwater vulnerability zone although there is no record of groundwater flooding on the site itself. It is also within a Source Protection Zone (SPZ2) with a high risk of contamination to groundwater although the EA has no in principle objections to development in SPZs.

Environment Agency maps show that some adjacent properties are at risk of flooding, but not from surface water runoff from this site. The maps are based on local topography however and would not take account of any potential flows from the accumulation of surface water due to underlying clay.

There is an area of former clay workings to the south and south east of the site. The underlying clay is likely to mean an engineered drainage solution will be required to manage surface water drainage. A Flood Risk Assessment (FRA) and appropriate flood mitigation measures including Sustainable Drainage Systems (SuDS) would need to be provided

4. Infrastructure

Consultation comments:

- Impact on infrastructure
- School is at capacity
- Impact on doctor's surgery

- Impact on sewerage system
- Sewerage system would need to be upgraded
- Opposed to the principle of development and its impact on doctor's surgery, school and other infrastructure

Council response:

Comments noted. Existing pressure on some local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

5. Traffic and road safety

Consultation comments:

- There is only limited opportunity for footpath enhancement
- Accident hotspot at the junction of Layland's Green and Inkpen Road due to poor line of sight, made worse in the winter when surface water runoff turns to ice.
- Concern that Layland's Green is too narrow and rural in character for the volume of traffic and the subsequent damage to verges due to inadequate passing places
- Concern that Layland's Green is in a poor state of repair and is too narrow and rural in character for any increase in volume of traffic. It would therefore need to be upgraded
- Concern that roads surrounding the site are narrow and rural in character with no pavements
- Concern for safety of pedestrians, especially school children

- Increase in volume of traffic through the village and the impact that would have especially at school drop off and pick up times.
- Concern that roads surrounding the site are narrow and rural in character and would not be able to cope with either the additional traffic or parking.
- Increase in volume of traffic through the village and consequent impact on road safety especially at the junction with the A4

Council response:

Comments noted. It is considered that an access with the appropriate 2.4 x 43 metre sight lines can be achieved from Layland's Green. The traffic generated from the development is not expected to have a significant impact on the wider highway network. Most of the traffic to and from the site will travel north to and from Burtons Hill and Newbury Street. The Burtons Hill / Newbury Street junction would seem acceptable with regards to sight lines. Sight lines are however restricted to the right at the Newbury Street / Station Road junction.

A footway can be continued southwards on the eastern side of Layland's Green to the site access. There are narrow intermittent pavements through the village. Footways exist along Burtons Hill up to Newbury Street. A footway exists along most, but not all of Newbury Street that would link into Kintbury village centre. Although footways do not exist along all of Newbury Street, in rural areas footways are often not provided. Also along Newbury Street, the road width and parked cars do ensure that vehicle speeds are kept lower that reduces concerns on safety for pedestrians.

6. Comments from the site promoter

- Considers it acceptable in landscape terms
- States that site will be developed to ensure it does not increase the risk of flooding elsewhere
- Assessment of protected species surveys to be submitted
- Landowners own surrounding land which could be used for translocation of species if appropriate
- Land required for access is in the same ownership
- States that there is potential to provide a secondary pedestrian access onto Laylands Green which would connect with the existing pavement
- States that there is potential to create pedestrian access to Craven Road
- States that the site could be brought forward immediately

Council response:

Comments noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Kintbury Rejected Sites

KIN008 – Land to the east of Layland Green and south of Holt Road and

KIN009 – Land to the east of Layland Green

Responses received – 1

1. Principle of development

Consultation comments:

- Impact on wildlife and natural environment
- Appropriate wildlife surveys will need to be undertaken
- The site provides a habitat for Great Crested Newts and possibly other protected species and therefore appropriate avoidance and mitigation measures will need to be implemented
- Flooding – very thick layer of clay means the surrounding area is liable to flooding from surface water. Existing properties have previously flooded
- Site acts as a natural buffer at present.
- Natural ground instability as thick layer of clay swells when wet and shrinks when dry
- Impact on village infrastructure and services especially roads
- Opposed to the principle of any new development in Kintbury
- Site is within the AONB

Council response:

Comments noted. The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided. Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy identifies Kintbury as a service village within a Settlement Hierarchy. This means that Kintbury along with the other service villages, has a limited range of services and has some limited development potential. As such, it is expected that Kintbury will accommodate some additional housing growth to 2026.

In order to assess the harm to the landscape of the AONB each site with potential for development must be considered on its merits. This has been done through the preparation of a Landscape Sensitivity/Capacity Assessment (LSA) where each site has been tested to see if development would result in harm to the natural beauty and special qualities of the AONB. Great weight has been attached to the conservation and enhancement of the AONB as part of this process. The LSA identifies sites that could potentially be developed without harming the landscape subject to further

detailed landscape and visual impact assessments and provided design, siting and green infrastructure requirements specified for each site are met. The LSA rules out sites where the harm is demonstrable.

Neither of the sites are proposed for allocation. They would need to be allocated and developed as part of a wider allocation to improve their relationship to the existing settlement and gain access. Development of a larger group of sites would be out of keeping with the role and function of Kintbury as a service village. Other sites in Kintbury are considered more appropriate for development.

KIN008 and a small part of KIN009 have been identified by the Environment Agency as lying within a groundwater emergence zone, a groundwater vulnerability zone and within Source Protection Zone 2. As a result a Flood Risk Assessment (FRA) would be required to support a planning application, along with the implementation of appropriate flood risk mitigation measures.

Both sites lie close to a Local Wildlife Site which is also a BBOWT nature reserve (Kintbury Newt Ponds) and which hosts a large breeding population of Great Crested Newts. An extended Phase 1 habitat survey and a Great Crested Newt survey would be required.

The traffic generated from the level of development proposed for Kintbury is not expected to have a significant impact on the wider highway network in relation to all the existing traffic using the network. A Transport Statement (TS) would be required to accompany a planning application for any site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. Road safety improvements would be considered as part of the Transport Statement.

Existing pressure on local services and facilities is recognised. Consultation has taken place with service providers to make them aware of the potential sites for future development and discussions are taking place on an ongoing basis regarding the provision of additional services/facilities to serve new development.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in

partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Lambourn General Comments

Responses received: 9

A petition objecting to development in Lambourn with 79 signatures was submitted to the Council.

1. Principle of Development

Consultation comments:

- Development should be laid out and of a scale that allows the Church to dominate views
- ADPP5 sets out that Lambourn will receive smaller growth than other settlements due to smaller district centre
- Concern that not all development required for the AONB is to be allocated through the DPD – could result in more development being allocated in Lambourn
- Overdevelopment of the sites – not in keeping with surrounding areas
- Is there any demand for development at all?
- Development will not provide housing that local people can afford – more people will come into the village as commuters or social housing tenants
- Lambourn is only being allocated 7 – 20 dwellings less than Hungerford, which is much larger and has a main line station
- Setting precedent for future development
- The local planning authority have not allocated, through the Preferred Options DPD, sufficient houses within the AONB to meet the Core Strategy figure, resulting in a shortfall. This shortfall could be accommodated in Lambourn.

Council response:

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.

The Core Strategy identifies Lambourn as a rural service centre within a Settlement Hierarchy. This means that Lambourn, along with the other rural service centres, has a range of services and reasonable public transport provision, with opportunities to strengthen its role in meeting the requirements of surrounding communities. As such, it is expected that Lambourn will accommodate some additional housing growth to 2026. The level of development to be provided within each of the rural service centres will vary depending on the character and function of the settlement, along with the assessment of individual sites submitted for housing development.

Policy ADPP5 of the Core Strategy sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy

and within this clear framework. The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. In order to ensure that the diversity and local distinctiveness of the landscape character is conserved and enhanced, the natural, cultural and functional components of the landscape character will be considered as a whole in accordance with policy CS19.

2. Ecology

Consultation comments:

- Proximity to Site of Special Scientific Interest (SSSI)/River Lambourn/Woodland
- Closeboard fences are unattractive and not wildlife friendly – more suitable boundary treatments are required

Council response:

It is essential that development does not adversely affect the Special Area of Conservation (SAC)/SSSI. The Council's Ecologist, along with Natural England and BBOWT, has been consulted and where appropriate additional information sought in the form of Habitat Surveys and/or full Ecological Assessments.

Where there is any concern regarding ecological potential on a site an Extended Phase 1 Habitat Survey will be required together with further detailed surveys as necessary. Appropriate avoidance and mitigation measures would need to be implemented where necessary to ensure any protected species were not adversely affected.

3. Employment/Racehorse Industry

Consultation comments:

- Lambourn is dependent on Equestrian industry – new development will cause difficulties and safety issues for horses going to/from gallops – could result in stables closing
- No other industry/jobs in the village
- Development on land used for equestrian activities (e.g. turnout paddocks) would impact on viability and welfare of horses
- Loss of land associated with the industry is against the Core Strategy Policy
- Development could impact on the viability of equestrian industry – which would impact on the viability of the village
- Do not want the village to turn into an area that does not care about the equestrian industry
- ADPP5 sets out the importance of the equestrian industry for Lambourn

Council response:

The equestrian industry plays a vital role within the local rural economy of Lambourn and surrounding areas. Development of sites for housing will not impact upon the racehorse industry. Sites which are in use as part of the racing industry, such as

paddocks, have been discounted from the site selection process in accordance with policy CS12 of the Core Strategy.

Policy CS12 aims to prevent pressure for redevelopment of existing facilities to other uses and the fragmentation of existing sites. Such pressures could lead to the decline of the industry locally, threaten the character and form of the settlement and increase pressure for replacement facilities in environmentally sensitive areas. Protecting yards from development for alternative uses is particularly important to the Council.

4. Flooding

Consultation comments:

- High water table in Lambourn
- Areas should be set aside to attenuate the flow of water following heavy rain – these areas could double up as informal open space
- Significant levels of flooding occurred in 2014
- Ongoing sewer work – as yet unknown whether this will be successful at solving the problems of sewer flooding

Council response:

The Council is aware of the flood risk in areas of Lambourn, as well as the existing pressure on the waste water network. Development will not take place within Flood Zones 2 and 3, and a Flood Risk Assessment (FRA) will be required to support a planning application for any development on a site greater than 1 hectare or any site deemed to be at risk of flooding in accordance with policy CS16 of the Core Strategy.

Both the Environment Agency and Thames Water have been consulted on potential housing sites to allow for any significant concerns to be raised early in the process.

5. Highways and transport

Consultation comments:

- Wider pavements are required to link new development to the village
- Street lighting needs to be carefully thought through
- Road access through the village is too narrow for more traffic
- Road Safety issues related to horses and traffic
- Traffic (throughout the village) leading to congestion
- Lorry parking on Rockfel Road causes major obstruction
- Lack of public transport
- Limited opportunities for walking/cycling
- Lack of parking at local services/facilities
- Lack of parking for residents

Council response:

The Council's Highways Team has been consulted on potential housing sites and it is considered that the level of development proposed within the Preferred Options DPD would result in limited traffic impact on the village. New development does provide the opportunity to increase the provision of public transport in the area and provide highway improvements. In addition, new development will be expected to provide appropriate pedestrian access routes and comply with the Council's parking policies.

6. Infrastructure

Consultation comments:

- Pressure on schools and doctors
- Lack of facilities (e.g. bank)
- Primary school is nearing capacity
- Many parents are choosing to send their children to smaller village schools elsewhere
- Secondary school is already outside the village
- The doctors surgery offers a good service to the village, but is unlikely to be able to continue with more development
- All site allocations should have a connection to the mains sewer. Where this is not possible, development may impact on pollution controlled waters.
- Improvements to the sewerage network to provide adequate capacity are required to be in place prior to the occupation of dwellings. This should be part of an allocation policy.

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure

on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

7. Landscape/setting

Consultation comments:

- Development in the AONB
- Impact on AONB landscape

Council response:

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. Sites promoted within the AONB for development through the plan-led process have been subject to a Landscape Sensitivity Assessment (LSA) to assess the potential impact of development on the landscape.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

LAM005: Land adjoining Lynch Lane, Lambourn

Responses received: 28

A petition objecting to development in Lambourn with 79 signatures was submitted to the Council.

1. Principle of Development

Consultation comments:

- The site has long been considered suitable for development
- Concern over development of the site/the site is unsuitable for development
- Least favourite site by residents responding to PC survey
- Of the 2 sites, this is considered more appropriate
- Well related to the village
- Density of development should be set
- Maximum height of development should be set
- Lambourn is not the right setting for large scale development
- Development should be in keeping with the remote location, history and reality that Lambourn is a working rural village not a commuter/dormitory village
- Out of keeping with the existing settlement pattern
- Outside settlement boundary – development should be kept within the village boundary
- Development should take place in areas where the infrastructure and the space can cope with the impact on the environment and community (e.g. outskirts of Newbury or Hungerford)
- Recent developments do not fit the requirements of the equestrian industry – they mainly wish to rent 1/2 bed properties
- There does not seem to be a requirement for such a large development
- Need homes for local people who have family networks for childcare and general well being
- Loss of greenbelt to prevent continuous development between Upper Lambourn and Lambourn
- Need for more mixed housing, which this development would help to meet
- Lambourn has experienced significant growth since 1970 and needs some time to consolidate

Council response:

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.

The Core Strategy identifies Lambourn as a rural service centre within a Settlement Hierarchy. This means that Lambourn, along with the other rural service centres, has a range of services and reasonable public transport provision, with opportunities to strengthen its role in meeting the requirements of surrounding communities. As such, it is expected that Lambourn will accommodate some additional housing growth to 2026.

Core Strategy policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. In order to ensure that the diversity and local distinctiveness of the landscape character is conserved and enhanced, the natural, cultural and functional components of the landscape character will be considered as a whole in accordance with policy CS19. It is important that settlements such as Lambourn and Upper Lambourn maintain their individual identity and this is reinforced through policy CS19.

It is evident from the consultation responses that there are mixed views regarding the suitability of this site for development. The Council's site assessments are set out within the Sustainability Appraisal (SA/SEA) Report.

With regard to the housing type and mix, policy CS4 of the Core Strategy outlines the Council's approach and states that residential development will be expected to contribute to the delivery of an appropriate mix of types and sizes to meet the housing needs of all sectors of the community, having regard to the local context and relevant evidence sources.

In addition, given the location of LAM005 within the AONB a Landscape and Visual Impact Assessment (LVIA) will be required for the site as part of any planning application, and this will inform the density and height of development on the site. This requirement would be set out within an allocation policy should the site be taken forward in the plan.

2. Ecology

Consultation comments:

- Impact on the River Lambourn
- Special Area of Conservation (SAC)/Site of Special Scientific Interest (SSSI)
- Environmental study should take place to ensure no adverse effect to the river as a result of development
- The River Lambourn is ephemeral at this point and particularly sensitive to changes in hydrology (Bullhead and Brook Lamprey as both sensitive to hydrological changes)
- Development could impact on local hydrology – water quality and water levels
- Appropriate avoidance and mitigation measures would be required to ensure no impact on hydrology – this requirement should be included in the policy for the site

- Planning permission may only be granted after ascertaining development will not adversely affect the integrity of the SAC/SSSI. The council would need to ensure the avoidance and mitigation measures were implemented
- Impact on wildlife/habitat (owls, red kites, partridge)
- Impact on Lynch Wood
- A semi-natural buffer is required along the River corridor
- Human and canine disturbance of the SSSI

Council response:

Development on the site will not adversely affect the Special Area of Conservation (SAC)/Site of Special Scientific Interest (SSSI). A Phase 1 Habitat Survey has been carried out by the site promoters and the Council's Ecologist is content with its content. Should development of this site take place a significant buffer/stand-off would be required from the SAC/SSSI and an extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected. In addition, a Habitats Regulations Assessment will be required. Should the site be taken forward as an allocation within the plan these requirements will be set out within an allocation policy.

3. Employment

Consultation comments:

- Lambourn is one of two major training areas in the UK for Horse Racing
- Impact on the equestrian industry (Road safety, viability, loss of paddocks) – could all cause the industry to move away from Lambourn
- Poor employment opportunities outside of the equestrian industry

Council response:

Development of the site for housing will not impact upon the racehorse industry. Sites which are in use as part of the racing industry, such as paddocks, have been discounted from the site selection process in accordance with policy CS12 of the Core Strategy.

Advice from the Council's Highways Department has concluded that given the size of development proposed on this site the traffic impact would be relatively marginal.

The village does provide a number of services and facilities all of which provide a level of local employment opportunities, but it is appreciated that some people do and will continue to travel out of Lambourn for employment depending on the nature of their profession.

Following the preparation of the Housing Site Allocations DPD the Council will be producing a new Local Plan which will plan for additional development across the District in the longer term to 2036. The new Local Plan will include provision for employment needs amongst other elements of land use planning.

4. Flooding

Consultation comments:

- Lambourn has severe drainage issues that need to be considered
- “Run off characteristics which are similar to greenfield behaviour would be required” from any development
- The site is within a groundwater emergence zone and is very wet
- There was standing water on the site during Feb 2014
- The Environment Agency (EA) have advised against development on the site – have recommended a sequential test would be required and policy requirement that no development was allocated in the flood zones
- Water runs through the site into the village centre then outwards to Eastbury
- Risk of contamination to ground water
- What would be done on the site to prevent flooding?
- Concern that allocation of the site would override the need to carry out formal modeling work on the flood risk on the site
- Hard standing should be permeable to allow infiltration

Council response:

The site is adjacent to the River Lambourn and as such the northern part of the site lies within Flood Zones 2 and 3. Initially the Environment Agency (EA) advised against development on the site but this advice was changed as part of the Preferred Options consultation response from the EA. The EA has now concluded that the site could be developed provided that there will be no development in Flood Zone 2 and 3.

In accordance with policy CS16 of the Core Strategy a Flood Risk Assessment (FRA) would be required to support any planning application on the site. The FRA would need to take into account all potential sources of flooding, including groundwater emergence and contamination. As part of the FRA consideration needs to be given to SUDS, along with the necessary mitigation measures to ensure the effective management of water flow and drainage.

5. Heritage

Consultation comments:

- Potential for Saxon remains on the site

Council response:

The Council's Archaeology Team has been consulted on the site and has concluded that a variety of archaeological features are in close proximity and on the site resulting in a high archaeological potential. Further investigation and evaluation will be required through the production of a Heritage Impact Assessment. This will need to be carried out as part of any planning application to inform the development of the

site. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy.

6. Highways and transport

Consultation comments:

- Number of homes should be reduced given the estimated car movements per day (336) on unsuitable entry/exit roads
- Narrow road network in area
- Traffic growth other than natural growth would have an immediate/detrimental effect on the village
- Traffic hotspots include The High Street, Oxford Street, Newbury Street, The Broadway/Big Lane, Lynch Lane
- Impact on Road Safety
- Poor public transport links
- High car dependency in Lambourn
- Roads are in a poor state of repair
- Problems resulting from on road parking
- The sites are acceptable in terms of public transport and contributions could be used to bolster the reliable although low frequency bus service linking Lambourn with Hungerford, Newbury and Swindon

Access

Consultation comments:

- Access has not been defined – all available exists must be used (The Park, Essex Place, Lynch Lane) to reduce congestion
- Lynch Lane and Essex Place both use Big Lane which is also used for moving horses around the village. Two cars are unable to pass each other on Essex Place
- The Park – this is a very dangerous stretch of road with restricted sight lines again the road is used for moving horses
- Potential for access from the area known locally as the Old Cricket Field to the NW of the site

Rights of Way (RoW)

Consultation comments:

- Improvements to RoW network required throughout Lambourn to improve access for equestrian activities to the countryside
- Consideration should be given to diverting the Lambourn Valley Way through the site (taking it away from the B4000)
- There is a contested footpath crossing the site

- Support the development of a public bridleway linking Upper Lambourn and Lambourn centre - would improve road safety

Council response:

The Council's Highways Team has been consulted on the site and has concluded that given the size of the development, the traffic impact from the proposal would be relatively marginal.

With regard to access, this can be obtained via The Park and Essex Place, although visibility at the Essex Place / Big Lane junction appears to be limited to an extent. Following further consideration the Council's Highways Department has identified Lynch Lane as another possible access.

In accordance with Manual for Streets it is preferable to have more than one access serving the development to enhance permeability through the site.

Access points via The Park and Lynch Lane would better integrate the site into the existing development, and keep any increase in vehicle movements away from the busy Upper Lambourn Road, which is also heavily used by horses.

There are footways and bus stops within the vicinity where services are available to places such as Newbury and Hungerford. The site is also within walking and cycling distance of Lambourn centre.

There are no formal public rights of way that pass through the site however there is an opportunity with the development of this site to improve the network of bridle paths and public rights of way within the area which would benefit the community and the racing industry as a whole. This will be further explored should the site be taken forward as an allocation, and will be set out as part of any allocation policy for the site.

7. Infrastructure

Consultation comments:

- Infrastructure improvements would come at a cost to the Council (and tax payers)
- The police station may be required to be reinstated full time
- Longer opening times at the library will be required to cater for commuters (current opening times are office times, with the exception of Saturday)
- Mitigation measures are rarely sufficient to cope with the scale on the complex combination of problems
- The schools are full
- No secondary school in the village meaning pupils are having to commute
- Health Centre is at capacity – it currently serves the community very well, but this is likely to change if there is more demand
- Sewer flooding is common

- Work currently being carried out on the drainage system, but to improve current situation, not take into account additional growth
- TW have concerns regarding wastewater services – a drainage strategy is required
- Development which puts strain on waste pipes is unacceptable

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

In particular, consultation has taken place with Thames Water. They have indicated that they have no concerns regarding the water supply capability, but do have concern regarding wastewater services for this site and improvements to infrastructure are likely to be required. In addition, infiltration from groundwater into the network has been identified as a strategic issue within Lambourn, and as such an integrated water supply and drainage strategy would be required as part of any planning application should the site be taken forward as an allocation. This requirement will be set out as part of any allocation policy for the site.

8. Landscape/setting

Consultation comments:

- In the AONB – which has a high degree of protection similar to that of National Parks – development would harm the appearance and character of the AONB
- Loss of views
- Loss of open space/recreation ground
- The site was considered not suitable for development in the Kirkham/Terra Firma 2011 Landscape Sensitivity Assessment & LMS report

- Concerns raised through the Core Strategy regarding development in Lambourn (NWD AONB)
- Disruption of the interface between the settlement and the AONB – having a buffer is not enough to reduce the impact of 56 houses
- Loss of grade 2 agricultural land

Council response:

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB.

The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma Consultancy) has carried out a Landscape Sensitivity Assessment (LSA) on the site and concluded that the site could be developed without detriment to the natural beauty of the AONB, subject to the retention of existing riverside vegetation and the provision of connections for pedestrians to link the existing housing with the valley floor to the north.

The LSA also recommended that the larger sites within Lambourn, LAM005 and LAM007, are either only developed in part concurrently, or either one or the other selected, to continue the pattern of sequential small developments in the village.

A Landscape and Visual Impact Assessment (LVIA) would be required as part of any planning application for development on this site to ensure any proposed development conserved and enhanced the surrounding landscape of the AONB. The requirement to provide this work as part of a planning application will be outlined within an allocation policy for the site should it be taken forward as an allocation within the plan.

Land Management Services Ltd (LMS) were appointed independently by the North Wessex Downs AONB unit to carry out an assessment of landscape impact to support their consultation responses to the Core Strategy in 2011. The Council's landscape consultant has considered the LMS study and provided a response to certain points where appropriate. This will be taken into consideration when assessing the sites.

9. Comments from the Parish Council

- The Parish Council included within their response a report compiled in 2000 as part of the Local Plan Inquiry. The report is with regard to LAM005, and the key points within are as follows:
 - Environment – the site is within the AONB. The site is immediately adjacent to the River Lambourn, the corridor of which is a Site of Special Scientific Interest.
 - Housing and the Community – Lambourn needs a period of consolidation to adjust to the social impact resulting from recent rapid growth.
 - Industry – impact on the racehorse industry – safety of horses and riders will be affected by increased traffic generation.

- Archaeology – Lambourn formed part of the parkland of Lambourn Place, and the site is believed to be a site of a Saxon palace. Any development would destroy this.
- Roads – roads are narrow, with blind bends and dangerous junctions. Inadequate footpaths and the roads are busy. Any increase in traffic will be detrimental to the safety of the road users.

Council response:

The issues raised within the report submitted by the Parish Council have been raised by other consultees as part of this consultation. The Council response to these issues is set out above under the relevant sub-headings.

10. Comments from the site promoter

- Support the inclusion of the site within the Preferred Options DPD and can confirm the site is available
- A Phase 1 Habitat Assessment has been commissioned
 - Concludes that care should be taken with the River Lambourn SSSI/SAC
 - There is scope for enhancing the wildlife in the local area
 - A number of recommendations are made to conserve biodiversity
- It is considered unreasonable that nearly 3ha of the site is designated undevelopable due to flooding risks. The land owners have been advised that the flood risk is confined to the river boundaries due to topography of the site. Until further work is carried out the whole site should be considered developable
- There are no significant/insurmountable issues (access, transport, landscape, flood risk, ecology, pollution) that would undermine the deliverability of the site
- Would like to see a density of 30dph rather than the 20dph set out in the DPD given the sustainable location of the site

Council response:

Comments noted.

The developable area of the site and the density at which the site can be developed will ultimately be informed by the site constraints, including the flood risk and ecology. In addition, given the sites location within the AONB the landscape will be the paramount consideration. As such the Landscape Sensitivity Assessment along with a Landscape and Visual Impact Assessment will be essential in informing how the site is developed.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

LAM007: Land between Folly Road, Rockfel Road and Stork House Drive, Lambourn

Responses received: 56

A petition objecting to development in Lambourn with 79 signatures was submitted to the Council.

1. Principle of Development

Consultation comments:

- Outside the settlement boundary in open countryside
- Too many houses proposed for the site/location
- Lambourn already suffering from overdevelopment
- Has a needs assessment been done for Lambourn – are these houses really needed?
- New houses will not be affordable for those working in the racing industry – usually only able to afford to rent
- Recent development has destroyed the village ethos and reduce the quality of life
- Lambourn does not need new housing - it does not want to become a dormitory town
- Windfalls will happen and will use brownfield land
- Previous planning application for The Folly, Folly Road was refused due to the impact on the character of the area
- Precedent set for future development around the village
- Development should take place in towns and cities where houses are already part of the landscape
- 2 suitable sites have been discounted for no apparent reason – neither are visually prominent unlike this site
 - land adjacent to existing built up area NW of Wantage Road
 - adjacent to Francomes fields
- Contravenes the NPPF – highly visible areas (ridges, landforms and open slopes) should be protected
- If the upper element of the site were thought to be appropriate it should only be developed in a way consistent with the rest of Folly Road – no more than 3-4 houses
- Loss of views
- Loss of privacy – site is sloping and would overlook existing gardens
- The two parts of the site should be considered separately
- Development out of keeping with local area. Change in character of area and community feel of the village
- Although the Council describe Lambourn as a district centre it is a poorly resourced district centre
- Conservation Area should prevent development
- Loss of light due to new development height

- New houses would largely house people who work away from Lambourn
- Lambourn Open Day raises thousands of pounds because people want to visit Lambourn and all the Racing Yards – this money is distributed locally (to the school, air ambulance and other local causes to enhance the village) – development will take away the attraction of the village
- The site should be retained as green belt
- Brownfield sites should be used – The Lamb and Bockhampton Road

Council response:

The West Berkshire Core Strategy (2006-2026) sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.

The Core Strategy identifies Lambourn as a rural service centre within a Settlement Hierarchy. This means that Lambourn, along with the other rural service centres, has a range of services and reasonable public transport provision, with opportunities to strengthen its role in meeting the requirements of surrounding communities. As such, it is expected that Lambourn will accommodate some additional housing growth to 2026.

Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Housing Site Allocations DPD will allocate non-strategic housing sites for development adjacent to the existing settlement boundaries of those settlements identified within the settlement hierarchy. As such a review of settlement boundaries will take place as part this DPD.

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. In order to ensure that the diversity and local distinctiveness of the landscape character is conserved and enhanced, the natural, cultural and functional components of the landscape character will be considered as a whole in accordance with Core Strategy policy CS19.

One of the consultation responses set out above outlines that *'2 suitable sites have been discounted for no apparent reason'*. Both these sites (LAM004 and LAM006) have been ruled out for landscape reasons. The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma) carried out a Landscape Sensitivity Assessment (LSA) on sites submitted within the AONB. This work concluded that both sites LAM004 (Land off Bockhampton Road) and LAM006 (Land at Wantage Road and Northfields) should not be pursued for development due to the landscape impact.

With regard to the housing type and mix, policy CS4 of the Core Strategy outlines the Council's approach and states that residential development will be expected to contribute to the delivery of an appropriate mix of types and sizes to meet the housing needs of all sectors of the community, having regard to the local context and relevant evidence sources.

2. Archaeology

Consultation comments:

- The site has high archaeological potential

Council response:

The Council's Archaeology Team has been consulted on the site and has concluded that a variety of archaeological features are in close proximity and on the site resulting in a high archaeological potential. Further investigation and evaluation will be required through the production of Heritage Impact Assessment. This will need to be carried out as part of any planning application to inform the development of the site. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy.

3. Ecology

Consultation comments:

- Disruption to local wildlife (bats, badgers, slow worms, frogs)
- Consideration of the River Lambourn Site of Special Scientific Interest (SSSI)/Special Area of Conservation (SAC) required – considering local hydrology and water quality/quantity (0.5km from site) – robust justification that the site would not negatively impact on the designated site would be required
- Trees (conifers) run parallel to Folly Road provide useful screening

Council response:

The Council's Ecologist has been consulted and has concluded that the site is possibly Chalk Grassland. An extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy.

The site is located over 600m (as the crow flies) from the River Lambourn, a SSSI/SAC, and it is essential that any development on the site will not adversely affect the SAC/SSSI.

4. Economic

Consultation comments:

- All yards in and around Lambourn are in use

- Lack of employment opportunities in the area
- Lambourn is recognised as the 'National Centre for Horse-Racing'
- Extra housing is not being met with additional employment opportunities

Council response:

The village does provide a number of services and facilities all of which provide a level of local employment opportunities, but it is appreciated that some people do and will continue to travel out of Lambourn for employment depending on the nature of their profession.

Following the preparation of the Housing Site Allocations DPD the Council will be producing a new Local Plan which will plan for additional development across the District in the longer term to 2036. The new Local Plan will include provision for employment needs amongst other elements of land use planning.

5. Flooding

Consultation comments:

- The site is subject to flooding
- Lambourn suffered badly from flooding in 2014, more houses are not going to help
- Loss of land to absorb rainfall - resulting in worsening flooding
- Lack of capacity for flood water in Lambourn causes flooding in Eastbury
- Lambourn is on a major aquifer
- Topography of the site could lead to greater flood risk downhill
- Comments relating to drainage/water flow are superficial and erroneous – the risk of water running downhill and flooding homes in Rockfel Road has not been considered
- The site is in flood zone 1

Council response:

The site is not within a Flood Zone and does not sit within an area of surface water flood risk. The site is located adjacent to a groundwater emergence zone but the risk of flooding on this site is considered low. Given the site is over 1 hectare in size a Flood Risk Assessment (FRA) would be required to support any planning application on the site in accordance with policy CS16 of the Core Strategy.

6. Highways and transport

Consultation comments:

- Folly Road/Rockfel/Child Street are too narrow for constant 2 way traffic
- HGVs are already an issue in the area, likely to get worse
- Folly Road turns into a byway which is not suitable for normal traffic
- Speeding traffic is already an issue

- Reliance on private car
- Poor road maintenance
- Unable to cope with level of traffic generated by the site

Access

Consultation comments:

- Access from Rockfel Road is unacceptable – it is a small cul-de-sac
- Access from Rockfel Road would require loss of trees and green area
- Access via Rockfel Road would be more suitable than Folly Road
- No plans to widen Folly Road, which is very narrow
- Poor sight lines at the end of Folly Road
- Need assurance that access via Rockfel Road can be achieved

Parking

Consultation comments:

- Rockfel Road has limited parking
- Car parking will be an issue
- Garages are built far too small to accommodate a modern car, even if they are big enough people do not use them for parking
- Driveways usually only allow for one parking space
- Current practices regarding on road parking will not cope with increased traffic levels
- Lack of car parking at services/facilities
- Any parking restrictions introduced would need to be enforced

Road safety

Consultation comments:

- Increased traffic will impact on road safety
- Conflict between traffic and horses trying to access the gallops
- The exit from Rockfel Road to Baydon Road/Folly Road to Upper Lambourn Road is dangerous with poor sight lines and racehorses regularly passing
- Children regularly play on the green area on Rockfel Road, which is proposed to be the access point

Public transport

Consultation comments:

- Poor public transport services
- No services after 6pm

- Public transport services in the village are considered acceptable, contributions from development could be used to bolster the reliable although relatively low frequency bus service linking Lambourn to Hungerford, Newbury and Swindon

Walking and cycling

Consultation comments:

- Expecting residents to walk/cycling is unrealistic
- No pavement along Folly Road

Council response:

This site can accommodate up to 24 houses that will generate circa 144 daily vehicle movements including circa 14 during the 08.00 to 09.00 AM peak.

It is considered that given the size of the development, the traffic impact from the proposal would be limited.

Access can be obtained from Folly Road, but it probably wouldn't be appropriate considering the rural nature of the road. An alternative place for access would be via Rockfel Road. This would also connect the site to footways in the vicinity. There are currently no footways along Folly Road. A pedestrian access onto Folly Road would also be welcomed.

There are footways and bus stops within the vicinity where bi-hourly services pass to Hungerford and Newbury. The site is also within walking and cycling distance of Lambourn centre.

7. Infrastructure

Consultation comments:

- Additional pressure on local amenities
- Only one bank and Co-op store
- Pressure on school
- The school is almost at capacity - there is no mention of increased capacity/provision
- Pressure on doctors
- Experiencing delays in getting appointments
- Issues of raw sewage seeping into the streets – system cannot cope with current pressure let alone additional pressure
- Unlikely Thames Water will be able to resolve the current issues in the area, let alone cope with additional pressure
- Work has been carried out by TW, but they cannot guarantee that the topography and geology will not cause future issues

- Water mains are fragile and frequently burst
- Lambourn is over a drinking water aquifer – potential for contamination of the water course
- Potential drainage/sewage issues have been sketchily dealt with
- Loss of safe areas for children to play (required for access to the site)

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population.

All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL.

Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

In particular, consultation has taken place with Thames Water and they have not raised any concerns regarding water supply or waste water capability in relation to this site. It should be noted that infiltration of groundwater into the network has been identified as a strategic issue within Lambourn, therefore should development come forward on this site an integrated water supply and drainage strategy would be required.

8. Landscape/setting

Consultation comments:

- Landscape sensitivity to residents of Rockfel Road, Stork House Drive and Folly Road
- Loss of country views
- Policies should protect the AONB and countryside from development
- Existing screening by line of fir trees would be removed and development would be a considerable scar on the skyline

- Only part of the site was deemed suitable for development
- LVIA would be required
- If the site is developed the only link between the 2 parts of the site should be a pedestrian link
- Agree with the comment that the cumulative impact of both LAM005 and LAM007 could affect the character of the village

Council response:

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB.

The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma Consultancy) has carried out a Landscape Sensitivity Assessment (LSA) on the site and recommended that only the land adjacent to Folly Road and below the 150m AOD contour in the south of the site be developed. Development on these parts of the site would be subject to a number of conditions, along with the protection and enhancement of key landscape features (set out within the LSA).

The LSA also recommended that the larger sites within Lambourn, LAM005 and LAM007, are either only developed in part concurrently, or either one or the other selected, to continue the pattern of sequential small developments in the village.

A Landscape and Visual Impact Assessment (LVIA) would be required as part of any planning application for development on this site to ensure any proposed development conserved and enhanced the surrounding landscape of the AONB. The requirement to provide this work as part of a planning application will be outlined within an allocation policy for the site should it be taken forward as an allocation within the plan.

9. Pollution

Consultation comments:

- Noise – from additional traffic & associated with construction
- Dust
- Groundwater contamination

Council response:

The Council's Environmental Health Department has been consulted on the Housing Site Allocation DPD Preferred Options and will have further opportunity to comment throughout the process. No concern has been raised regarding this site.

The site is at risk of groundwater contamination given the local aquifer and the level of risk and any necessary mitigation measures will be explored further through a Flood Risk Assessment to be provided as part of any planning application.

10. Racehorse industry

Consultation comments:

- The site is in conflict with the Core Strategy (CS12) – the site is currently used as turnout paddocks, these are essential to the training yards. Development of the site would erode the supply of paddocks around the edge of Lambourn. The Necessity Test has not been carried out - there is no clear reason why the tests of the CS are not applicable for plan making. A number of the other sites considered are not in equestrian use, it is not clear why these sites are not considered suitable for housing
- The interest of the racing industry must generally prevail – it is a fundamental principle that has been accepted by the local authority for decades and must remain at the forefront of our minds
- Inconsistent approach - loss of paddocks has previously been used as a reason for rejection, it should be used here as well
- Development of LAM005 would not impact on any stables
- Site used by equestrian industry
- Impact on viability of stables/yards, could lead to their closure
- Turn out pasture is the major setting point of Lambourn over other areas – loss of this land would mean owners go elsewhere and lead to a loss of employment/economic activity in the village (as majority of employment opportunities in Lambourn are related to the equestrian industry)
- The landowner is claiming that the site has not been used by the racing fraternity – having lived here for 17 years I can categorically say the land is used for turning out horses all year round
- Development of the site, even leaving the centre of the site for open space would not provide turn out land as there would be no access from the yard
- Site is currently part of an expanding racing yard – development could stifle growth of the yard and lead to the loss of jobs
- There is a successful business operating from the yard and using the site as a paddock/turnout

Council response:

The racehorse industry plays a vital role within the local rural economy of Lambourn and surrounding areas. It is evident from the consultation responses that the site is currently used as turnout paddocks for an adjacent yard. As such the loss of the site for housing development would be contrary to policy CS12 of the Core Strategy.

Policy CS12 aims to prevent pressure for redevelopment of existing facilities to other uses and the fragmentation of existing sites. Such pressures could lead to the decline of the industry locally, threaten the character and form of the settlement and increase pressure for replacement facilities in environmentally sensitive areas. Protecting yards from development for alternative uses is particularly important to the Council.

11. Settlement boundary

Consultation comments:

- The old settlement boundary excludes land which is already built over (Francomes Fields to SE, land from Southbank on the NW side of Newbury Road extending to Long Hedge and land SW of Windsor house paddocks to Lambourn Racehorse transport) – all these sites would be suitable for development and could be considered windfall sites

Council response:

As part of the Housing Site Allocations DPD the Council will be reviewing the settlement boundaries of those settlements within the settlement hierarchy of the Core Strategy. Criteria for this review were consulted upon as part of the Preferred Options consultation in 2014.

Completed developments are already taken into account in terms of the housing requirement/numbers. Such areas of land adjacent to the settlement boundary will be considered further as part of the settlement boundary review.

12. Site tenant

Consultation comments:

- Start up racehorse training business
- The site forms a significant and fundamental part of the facilities for the yard as turnout fields
- Development of the site would have a negative impact on business
- Development is contradictory to the policy in the Core Strategy
- The fragmentation of sites leads to additional pressure which could result in a decline of the industry
- Employ 8 staff and provide business to local suppliers
- Currently have the space to expand the business which would further contribute to the local economy
- One of the main selling points of Lambourn is the openness and turnout facilities – these support the health and mindset of the horses – the BHS recommends a rough guide of 1 acre per horse for a horse in combined exercise
- Impact on road safety for horses being ridden
- Racehorses are sensitive and nervous, and disruption to their home environment can have significant impacts on their health/wellbeing and ultimately their performance
- Would like to see signalised crossing are implemented in specific locations and 30mph speed limited implemented on the B4000 through Upper Lambourn
- The Jockey Club Estates have invested significantly into central facilities in Lambourn (Gallops/walkways) these require a minimum number of horses to maintain their viability
- Should the site go ahead, it would set a precedent for other yards
- LAM002A has been rejected – the reasons are the same for this site
- Should development be required in Lambourn it should go ahead on land that is not used for horses

Council response:

It is evident from the consultation responses that the site is currently used as turnout paddocks for an adjacent yard. As such the loss of the site for housing development would be contrary to policy CS12 of the Core Strategy.

Policy CS12 aims to prevent pressure for redevelopment of existing facilities to other uses and the fragmentation of existing sites. Such pressures could lead to the decline of the industry locally, threaten the character and form of the settlement and increase pressure for replacement facilities in environmentally sensitive areas. Protecting yards from development for alternative uses is particularly important to the Council.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Lambourn Rejected Sites

A petition objecting to development in Lambourn with 79 signatures was submitted to the Council.

LAM002A: Land at Meridan House and Stud

Responses received: 2

Consultation comments:

- Access issues - access little more than an agricultural track
- Highway concerns given the number of dwellings proposed

Comments from the site promoter:

- The following changes have been made to the site to address the reasons for rejection
 - Reduce site area to 0.41ha (9 units)
 - Access via 2 private drives (Edwards Hills and The Classics/Coppington Gardens) – Highways objections no longer exist and traffic reduced
 - Revise settlement boundary - a continuation of the existing on the western edge
 - Low density permeable development similar to village edge
 - Drainage is not an issue – further detailed evidence can be provided, the site does not suffer from flooding

Council response:

Comments noted.

The new site layout submitted as part of the consultation has been considered and the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) has been updated where appropriate.

It is considered that the new proposed layout will still result in the potential loss of land used as paddocks for the racehorse industry, albeit a small area, and therefore the loss of this part of the site for housing development would be contrary to policy CS12 of the Core Strategy.

It is considered that the proposals on the revised layout plan do not go far enough to address the concerns set out in the site assessments. The Landscape Sensitivity Assessment (LSA) states that the scale of the whole site as assessed related well to the settlement pattern. However it is felt that the revised proposals, whilst addressing concerns over access, are out of character with the existing settlement pattern.

The Council's Highways Team has not raised any concern over the proposed new layout at this stage.

LAM002B: Land at Meridan House and Stud

Responses received: 1

Consultation comments:

- The site is detached from the village and does not relate or connect with the existing settlement boundary

Council response:

Comments noted.

The SA/SEA Report outlines the Council's justification for not taking this site forward as a preferred option.

LAM003: Land between the River Lambourn and Bockhampton Road

Responses received: 1

Comments from the site promoter:

- There is no one site in Lambourn that does not have constraints, therefore it is surprising that the focus has been on purely landscape and visual terms.
- This site is one of the best sites for development and can successfully provide the required development without harmful impacts to the AONB, character of the area, highway network or amenity
- The 2011 Landscape Sensitivity Assessment concluded that some development can be considered adjoining the settlement within all 8 SHLAA sites examined without incurring material harm to the AONB
- The site specific advice and general advice directly conflict with one another
- The LSA has been unduly negative about the impact of the site
- The river is not a constraint for development
- Settlement boundaries have not been reviewed since the Francomes Field properties were built in 2005 and a new dwelling in the corner of the site was constructed. It is reasonable to assume that the settlement boundary will include Francomes Field and potentially the new dwellings and sports club
- The site is completely surrounded by built form and is part of the urban or semi-urban nature of the area, it is not part of the open river valley to the east of the village as suggested by the LSA
- The site is currently being used as a contractor's compound
- It is evident that Lambourn suffers from traffic problems and many roads are unsuitable for additional traffic , the site located on a relatively minor road and has good access to Newbury Road
- Too much weight has been given to the landscape impact of the site
- The site could provide part of the 80 dwellings required for Lambourn or additional housing above this
- The site is under option to a developer who is ready to deliver (Groundplan Ltd)

Council response:

Comments noted.

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB.

The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma Consultancy) has carried out a Landscape Sensitivity Assessment (LSA) on potential housing sites within the AONB, including LAM003. The LSA for this site concluded that development of the site would result in harm to the natural beauty of the AONB. It would affect the key characteristic of the open river landscape and reduce the overall effectiveness of the open countryside to the south in maintaining a rural approach to the village. The LSA recommends that the site is not pursued further for development.

It is noted that the consultation response highlights an error within the LSA in relation to the general conclusions for Lambourn. The LSA states that 'some development can be considered adjoining the settlement of Lambourn within all eight potential SHLAA sites examined without incurring material harm to the special qualities and natural beauty of the AONB'. This is a typographical error and should read '...within some of the eight potential SHLAA sites....'. This does not change the conclusion of the site assessments within the LSA.

As part of the Housing Site Allocations DPD the Council will be reviewing the settlement boundaries of those settlements within the settlement hierarchy of the Core Strategy. Criteria for this review were consulted upon as part of the Preferred Options consultation in 2014.

LAM009: Land east of Hungerford Hill

Responses received: 1

Consultation comments:

- The site is poorly related to the settlement boundary
- Access issues
- Does appear to have a favorable landscape assessment

Council response:

Comments noted.

The Sustainability Assessment/Strategic Environmental Assessment (SEA) Report outlines the Council's justification for not taking this site forward as a preferred option.

LAM013: Windsor House Paddocks

Responses received: 1

Comments from the site promoter:

- Disappointed that despite detailed submissions to the Strategic Housing Land Availability Assessment (SHLAA), including a Flood Risk Assessment (FRA) and Landscape Visual Impact Assessment (LVIA) the site has not been chosen as a preferred option
- The only reason given is flood risk
- The site should be allocated and included within the settlement boundary
- Surface water/ground water flooding can be mitigated
- Redevelopment provides opportunities to help alleviate some of the flooding experienced in the village
- A revised masterplan has been submitted showing a large area at the centre of the site for flood mitigation
- The site compares favourably with the two preferred options
- Generally feel that the housing numbers for the AONB, and Lambourn in particular are too low
- The site performs better in the Sustainability Appraisal/Strategic Environmental Assessment (SEA) than all other sites – but flooding concerns are considered so significant by the Council that they outweigh the merits of the site – these issues can be overcome by mitigation
- A detailed FRA and discussion with the Council's drainage engineer have taken place showing that the issues experienced in recent years can be mitigated
- Flooding occurs because there is no formal drainage of the site
- Onsite and offsite improvements are proposed – onsite measures would only be available should the site be allocated for development, whereas offsite measures could come forward quicker because of potential S106 contributions
- There would also be potential to install a flood bund/embankment further up the catchment to limit overland flow
- The susceptibility of the site to flooding should not prevent housing coming forward on the vast majority of the site
- The Environment Agency have not raised any concerns about the site
- The site has no other constraints confirmed by the SA/SEA
- It is close to the village centre and has a lesser landscape impact
- Development would improve footways in the immediate vicinity
- Improve sight lines at Crowle Road/Baydon Road junction
- Provide provision of a bus lay-by to facilitate safe and efficient school drop offs

Council response:

Comments noted.

With regard to the housing number within the AONB, this was discussed at length during the Core Strategy Examination (2010-2012). Core Strategy policy ADPP5 states that '*...provision will be made for the delivery of up to 2,000 dwellings...*' within the AONB, to ensure that growth within the area conserves and enhances its

special landscape qualities. Consideration of the landscape takes priority within the AONB when assessing sites for development. Lambourn is identified as a rural service village within the Core Strategy settlement hierarchy and as such it is expected that the village will accommodate some additional housing growth over the plan period. The level of development to be provided within each of the rural service centres will vary depending on the character and function of the settlement, along with the assessment of individual sites submitted for housing development.

The SA/SEA Report outlines the Council's justification for not taking this site forward as a preferred option. Although the site is well related to the existing settlement the flood risk associated with the site, along with its history of flooding, has weighed strongly against the allocation of this site. There are records of the site flooding in both 2007 and 2014 when severe flooding occurred across West Berkshire. In 2007 the flooding on this site occurred to such an extent that it also flooded the adjacent road. Whilst it is appreciated that very often technical solutions can be implemented to reduce the risk of flooding, it is considered that there are alternative sites within Lambourn which are more suitable for allocation.

In addition, the site layout plan provided with the consultation response does not reflect the current settlement pattern and further highlights the concern regarding flood risk.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Pangbourne General Comments

Comments received: 1

1. Infrastructure

Utilities

Consultation comments

- Allocated sites should have a connection to the mains sewer. Failure to do so may impact on pollution controlled waters.
- Prior to the occupation of dwellings, improvements to the sewerage network to provide adequate capacity are required to be in place.
- Requirements to ensure that improvements and connections to the sewerage system capacity are carried out could be included in the supporting policy to the allocation in the DPD.
- Liaison should take place at the earliest opportunity with Thames Water to determine where and when any improvements are to be made, the form they will take and how they can be implemented.
- Environment Agency wish to be engaged in any discussions should there be any significant issues, including at sewage treatment works.
- It may be necessary to update the Infrastructure Delivery Plan following liaison with Thames Water.
- Opportunity to use money from the Community Infrastructure Levy if there are funding gaps to bring forward the required sewerage infrastructure.

Council response:

Comments noted.

A Duty to Cooperate meeting was held with Thames Water on 12 May 2015. Thames Water explained the background to their comments made during their preferred options consultation.

Thames Water advised that under the Water Industry Act developers have an automatic right to connect to the sewer; this can be addressed at the planning policy stage by asking for a drainage strategy and then later by asking for conditions at the planning application stage.

It was agreed that the way forward would be that the policy for the sites will ask that an integrated strategy for water and wastewater is prepared to support a planning application and that this should cover flood risk, water quality and conservation. The strategy would need to be clear how a solution would be delivered to any concerns identified as the development came forward. This could then be applied to all sites, regardless of whether concerns have been raised by Thames Water to date.

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Any redevelopment of sites will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

PAN001: Land at Green Lane, Pangbourne

Comments received: 126

A petition objecting to the development of both PAN001 and PAN002 for housing with 217 signatures was submitted to the Council.

1. General

Consultation comment:

- Site name of Jesmond Hill incorrect – Jesmond Hill is a private property on Bere Court Road that is unconnected with the site.
- Site boundaries differ between the 2011 Landscape Sensitivity Assessment and the HSA DPD preferred options document. Validity of the potentially developable area therefore questionable.
- Significant part of private garden shown within the red line boundary to PAN001.
- Disagreement with the positive score within the SA/SEA for the criteria ‘will it support and encourage healthy, active lifestyles?’. Gradient of roads into Pangbourne, lack of footpaths/street lighting, narrow roads and increased traffic movements preclude against an increase in opportunities for cycling and walking.

Council response:

Prior to the publication of the 2013 Strategic Housing Land Availability Assessment (SHLAA) (a technical document that informs the development plan process and provides background evidence on the possibility of available land within), PAN001 was promoted for a larger area which included the property ‘Jesmond Hill’. Earlier versions of the SHLAA referred to the site as ‘Jesmond Hill’. For the 2013 update of the SHLAA, a smaller area was promoted which excluded Jesmond Hill; however the site was incorrectly referred to as Jesmond Hill within the SHLAA document. Within the Housing Site Allocations DPD preferred options document, PAN001 is referred to as ‘land at Green Lane’.

The red line boundary that appears in both the 2013 SHLAA and the Housing Site Allocations DPD preferred options document is the area put forward by site promoter. This area is in sole ownership.

Consultation comment:

- Impact of development on property prices.

Council response:

The issue identified is not a material consideration in the planning process. A material planning consideration is one which is relevant to making the planning decision in question, eg. whether to grant planning permission or not. In general,

material considerations are concerned with land use in the public interest, so the protection of purely private interests such as the impact of development on the value of a property or loss of private rights to light could not be material considerations.

Consultation comment:

- Unsustainable.

Council response:

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. The assessment of this site did not result in any significant impacts on sustainability. The SA/SEA can be viewed at:

<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38059&p=0>.

Consultation comment:

- Cumulative impact of development with PAN002.

Council response:

There are issues with the site which affect its suitability for allocation (highways). Such issues are not experienced with the other site that has been shortlisted for allocation (PAN002) within Pangbourne. On this basis, the Council are not proposing to allocate PAN001.

Consultation comment:

- Pangbourne restricted by geography.

Council response:

Policy ADPP5 of the Core Strategy recognises that whilst there are some opportunities for growth in Pangbourne, those outside of the settlement boundary are partly constrained by environmental factors, eg, the floodplain and the sensitivity of the landscape. This has affected the amount of development to be allocated in Pangbourne.

Consultation comment:

- Brownfield sites require greater groundworks and incurred costs before they can be built. Developers would rather reap the benefit of greater profit without the expense of rendering a site suitable.

Council response:

Comment noted. The Housing Site Allocations DPD will be allocating sites outside of the settlement boundary, ie. sites in the countryside, to help deliver the required

housing. Available brownfield sites that concur with policy have been taken into account when calculating the remaining housing requirement. Therefore, the Council is proposing the minimum amount of housing on greenfield sites to meet the housing requirement set out in the Core Strategy.

2. Affordable housing

Consultation comment

- 40% affordable housing should be provided.
- Affordable housing is required. The two preferred options for Pangbourne are therefore required to meet needs.
- Doubt that affordable housing will be delivered.
- Proposed homes will not be affordable because the site is not brownfield.
- Affordable housing will be cramped with no gardens.
- Freedom of Information request revealed that no affordable housing units were completed in Pangbourne in the plan period up to 31 March 2013. This should be considered against the scale of housing need in the east of the district, particularly Pangbourne.

Council response:

Should the site be allocated and a planning application subsequently submitted, then provision of affordable housing would be required in accordance with Core Strategy policy CS6 (provision of affordable housing).

3. Consultation process

Consultation comments:

- Consultation process and timing inappropriate – consultation took place over the summer holiday period, only those within 100m of shortlisted sites were consulted, letters were marked ‘to the occupier’ and could have been mistaken for junk mail, letters received after the consultation start date, incorrect naming of the site delayed alerting people, lack of formal public meeting with planning officers in attendance. This indicates that the Council are trying to push through the proposals,
- The consultation form seeks suggestions for alternative options – unreasonable for development not to go ahead unless an alternative is identified.

Council response:

The Preferred Options consultation was an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

The Council was aware that the consultation would fall over the school summer holiday period and this was unavoidable due to the tight timeframe for the preparation of the DPD. The consultation period was extended from the usual six weeks so that it ran for seven weeks. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

Public consultation on the preferred options stage of the DPD involved notifying all those registered on electronic consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case with consulting on major planning applications, direct letters were sent to properties located within 100m radius of the proposed sites, and a press release was issued with further media contact. The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the response to the consultation was extensive with around 4,500 people making around 8,500 comments.

4. Covenants

Consultation comments:

- Development would breach the restrictive covenant on the site that prohibits the erection of more than two private residences with entrance lodges, stabling, coachmen's and gardener's cottages.
- A covenant grants the owners and successors in title of Woodlands, Flowers Hill rite of passage over the land or track 12 feet wide leading from the property to Green Lane and includes the use of vehicles over the land or track. The land or track falls within the boundary of PAN001.

Council response:

A restrictive covenant is a private interest in or restriction over land. The Council's legal services team has advised that the only person who can enforce a covenant is the person with the benefit of the same.

The site promoter was contacted to clarify whether the covenant exists and if so, who has the benefit of the covenant. The clients of the site promoter have been unable to confirm if the covenant exists commenting that a review of the title documents will show whether the restrictive covenant exists.

The responses from the two owners of 'Woodlands' note that they have been granted right of way by foot and vehicle by the owners of PAN001 to use the 12ft wide track with runs parallel to the rear of the west facing boundary of 'Woodlands' and runs along to Green Lane very close to its junction with Courtlands Hill.

5. Cultural heritage and the built environment

Consultation comments:

- Historic significance to Green Lane due to its use by the Abbot and monks of Reading Abbey when on retreat to Bere Court – site is protected by law from any attempts to change it.
- The aspect and views of the site have been subject to poetry, eg. 'Bury my Heart'.
- Planning departments have a duty of care to ensure that the heritage of villages is protected.
- Site may be of historical and archaeological significance from Neolithic, Saxon and Roman periods. A Neolithic burial site was found a few hundred metres from the site. Only research and investigation will establish if there is any significance.
- Disagreement with the comment that there are no assets against the SA/SEA criterion 'will it ensure that the built, historic and cultural environment is conserved and enhanced?'. Green Lane is an ancient track.

Site promoter comments:

- Development would not impact upon the Pangbourne Conservation Area.

Council response:

Comments about the site being subject to poetry noted.

All sites have been subject to consultation by the Council's Archaeological Officer, and the comments made at preferred options in respect of the historical significance of Green Lane and potential for archaeological significance on the site have also been considered by the Council's Archaeological Officer. No constraints have been identified.

6. Ecology

Consultation comments:

- The proposal is contrary to national and local planning policy, eg. paragraphs 113 and 117 of the NPPF, and policy CS17 of the Core Strategy.
- Western part of the site is identified as a Biodiversity Action Plan (BAP) priority site, and the impact of development upon this is unknown. Several BAP priority species observed on or adjacent to the site – dormice, grass snake, frogs, toads, thrush, spotted woodpecker, hedgehogs, bats, stag beetles, thrushes, and skylarks. Site requires conservation under the UK Biodiversity Acton Plan.

- Impact on wildlife (in particular bats, birds, bees, deer, badgers, slow worms, wild boar, foxes) and wildlife corridors.
- Mitigation will not replace the variety of species found on the site.
- The site is an uncultivated meadow, and has been for the last 40 years, which is rare in the UK.
- Mature oak trees on the site and on Green Lane, the latter of which have Tree Preservation Orders (TPOs). The oak trees on Green Lane have been damaged by unsuitable vehicles using the lane, and increases in traffic will cause further damage.
- Felling trees to enable development contrary to the definition of 'sustainable' in the National Planning Policy Framework.
- Traffic will damage trees and verges.

Site promoter comments:

- The site is a Biodiversity Action Plan (BAP) habitat meaning that a Phase 1 Habitat Survey will be required, although this is not referred to in the Council's assessment or Core Strategy policy CS17. As the scheme evolves, every effort will be made to ensure that opportunities to achieve net gains in biodiversity as part of the development will be explored.
- Development would not impact upon key environmental designations.

Council response:

Initial screening of the sites by the Council's ecologist has taken place, and sites with significant ecological issues have not been taken forward as preferred options.

The Council's ecologist has advised that should the site be allocated, an Extended Phase 1 Habitat Survey will be required to support a planning application, together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, if appropriate to ensure any protected species were not adversely affected.

Should the site be allocated and a planning application subsequently submitted, then development would need to accord with Core Strategy policy CS17 (Biodiversity and Geodiversity) which requires that new development maximises opportunities for the achievement of net gains in biodiversity and geodiversity.

7. Economy

Consultation response:

- Limited job opportunities in Pangbourne and many residents commute.

Council response:

Pangbourne is a rural service centre within the West Berkshire Settlement Hierarchy, as set out in the Core Strategy DPD. Rural service centres are defined as having a range of services and reasonable public transport opportunities, and are therefore a focus for development. The Core Strategy was found sound following an

Examination by an Independent Inspector who agreed that based on the evidence provided, the AONB spatial area would be able to take this amount of development.

8. Flood risk

Consultation comments:

- Proposal is contrary to paragraph 100 of the NPPF – development would worsen flooding.
- Site adjacent to an area prone to surface water flooding.
- Development on the site will result in increased run-off and subsequent flooding in Pangbourne. Existing soakaway drains unable to cope, eg. those on Green Lane and Tidmarsh Road.
- Site within the River Pang catchment whereby there is no spare capacity.
- Flood risk in Pangbourne.
- Climate change will increase flood risk.
- The Council have not undertaken a Flood Risk Assessment (FRA).
- Soakaway drains installed by the Council on Green Lane and Tidmarsh Road are ineffective.

Site promoter comments:

- Whole site within Flood Zone 1.

Council response:

The site itself falls within Flood Zone 1 whereby there is a low probability of fluvial flooding. The site is not within an area susceptible to surface water flood risk.

Should the site be allocated and a planning application subsequently submitted, then a FRA will be required to accompany a planning application in line with the requirements of Core Strategy policy CS16 (Flooding). This policy also requires the provision of Sustainable Drainage Systems (SuDS) in all new developments. SUDs are designed to control surface water run-off close to where it falls and mimic natural drainage.

Comments regarding flood risk in Pangbourne noted. Sites that have a significant flood risk have not been taken forward.

Comments that climate change will increase flood risk noted.

9. Gaps between settlements

Consultation comments:

- Whilst concept of gap not recognised in planning law, gaps enable the identity of communities.
- Government guidance requires boundaries to be defined by natural boundaries. Previous applications refused.

- Site forms part of the strategic gap. Local Plan Inspector commented that this section of Green Lane is a well conceived and demonstrable boundary' to the settlement. Moving the boundary would not establish a logical, defensible alternative.
- There is limited separation between settlements (Pangbourne/Tidmarsh and Pangbourne/Purley) which would be further reduced by development.
- Development will contribute towards urban sprawl into the countryside. Risk of sprawl to Reading.
- The Council has indicated that policies relevant to protecting gaps are no longer well enforced.
- Erosion of greenbelt between settlements (Reading/Pangbourne and Tidmarsh/Pangbourne).
- Pressure in green belt stretched to the limit, particularly as Reading is proposed as a garden city.

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19 (Historic Environment and Landscape Character) of the Core Strategy.

The site is not within statutory greenbelt and there is no such designation within West Berkshire.

10. Geology

Consultation comments:

- Geology of the area not considered.
- Substantial evidence that the site is in an area that has a moderately high risk of swallow holes – the geology sequence for the site (Head deposits of gravel, sand, silt and clay over Seaford Chalk Formation) is the same as that at two development sites on Bere Court Road (Shivam House and Croft Drive), where land levels are 5-10m lower and several swallow holes were discovered.

Council response:

Comments noted. There are issues with the site which affect its suitability for allocation (highways). Such issues are not experienced with the other site that has been shortlisted for allocation (PAN002) within Pangbourne. On this basis, the Council are not proposing to allocate PAN001.

11. Greenbelt

Consultation comment:

- Proposal is contrary to paragraphs 17, 79, 83, and 89 of the NPPF.

Council response:

The site is not located within statutory greenbelt. No such designation exists within West Berkshire.

12. Highways and transport

Consultation comments:

- Poor quality road surfaces.
- Lack of road maintenance.

Council response:

Comments noted. These are not planning matters.

Access

Consultation comments:

- No appropriate access to the site. Unacceptable for a housing site to be located where the access arrangements are clearly deficient. The Council must consider its future liability to a claim in the event of a road accident given the highway safety risk has been highlighted.
- Only feasible access is via Pangbourne Hill and Bere Court Road, however both roads are narrow and lack footpaths.
- Narrow width of Green Lane precludes that the main access to the site will be from Flowers Hill and Courtlands Hill. Both are privately owned roads and less direct. There are poor sight lines on Courtlands Hill.
- Green Lane unsuitable for access – narrow with blind bends and overhanging mature oak trees (some of which have Tree Preservation Orders).
- The red line boundary for the site includes part of a private garden that belongs to Jesmond Paddock. Access will therefore need to be formed further down Green Lane unless the private garden is compulsory purchased.
- Disagreement with the statement in the SA/SEA that Green Lane and Bere Court Road 'may be unsuitable' for access. Both are completely unsuitable.

Site promoter comments:

Site can be accessed via Bere Court Road onto Pangbourne Hill and via Green Lane onto the A340 Tidmarsh Road.

Council comments:

The Council's Highways and Transport team has advised that access can be obtained via Bere Court Road onto Pangbourne Hill and via Green Lane onto the A340 onto Tidmarsh Road. However, they have raised concerns that the roads are often narrow surrounding the site and may be unsuitable for such additional volumes of traffic. Furthermore, they have advised that there are no footways in the vicinity and it will not be possible to provide any.

The red line boundary of the site as depicted in the Housing Site Allocations DPD preferred options document is that submitted by the site promoter. The site submission details state that the site is in sole ownership.

Highway network/traffic

Consultation comments:

- Proposal is contrary to national and local planning policy – paragraph 35 of the NPPF and Core Strategy policy CS13.
- Local road system in vicinity of site inadequate and incapable of supporting additional traffic both during and after construction, eg. narrow roads, lack of footpaths. Improvements, which would include road widening, road surface improvements/repairs, demolition of walls/listed buildings, re-engineering of junctions, may necessitate the compulsory purchase of land.
- No evidence to show that the Council has assessed the quality and capacity of transport infrastructure. Shortcomings are structural and historic and cannot be remedied or significantly alleviated.
- Concern that traffic growth already higher than anticipated in the Council's recent study into the road junction and traffic flows in Pangbourne by the church. The study concluded that there is no solution to allow acceptable flows of traffic at peak times. Request made to see the Council's recent study into the road junction and traffic flows in Pangbourne so that the findings can be validated.
- Impact on Green Lane, Pangbourne Hill, Tidmarsh Road, Bere Court Road, Courtlands Road, Flowers Hill, Shooters Hill, Reading Road, Tidmarsh, Purley.
- Development of 36 houses would add 200 traffic movements. High number inconsistent with the NPPF's definition of sustainable.
- Allowance not made for 'generated traffic'. Contended that the traffic movements figure will be 40-50% higher with 600 vehicle movements per day from PAN001 and PAN002.
- Site selection – site assessment section of the SA/SEA does not make allowance for generated traffic. Traffic movements will therefore be higher.
- Courtlands Hill and Green Lane are both unadopted roads and residents pay an annual subscription to cover the cost of maintenance. Additional traffic movements generated by the development would add to the maintenance costs.

- Other similar sized sites within the AONB have been rejected due to highway implications, eg. KIN011 and KIN016.
- Existing congestion and traffic disruption would be exacerbated by development, particularly at peak times.
- Cumulative impact of development on congestion not considered.
- Roads in vicinity of site used for rat running, which would increase following development of the site.
- Banking, hedges and overhanging trees result in disruption on Green Lane.
- Significant increase in travel choice for residents unlikely. Site inaccessible by a range of transport modes.
- 7.5 tonne weight restriction on Green Lane ignored.
- Bere Court Road is designated as a 'quiet lane' by the Countryside Initiative and supported by the Department of Transport.
- Commuting/reliance on car use likely due to the limited capacity at Pangbourne Primary School, the distance of the site from the centre of Pangbourne and the incline of Pangbourne Hill.
- Road safety concerns – poor sight lines at junctions (Green Lane/Bere Court Road, Green Lane/Courtlands Hill, Bere Court Road/Pangbourne Hill), lack of footpaths, risk to pedestrians and cyclists from increased traffic movements, lack of street lighting, roads dangerous in poor weather conditions, issue of speeding along local roads, no evidence that development would improve road safety.
- Council has duty of care to minimise the risk of accidents through its planning decisions.
- The site selection SA/SEA states that any development would "...have the potential to improve road safety", but the site commentary states that "there are no footpaths in the vicinity and it is not possible to provide any". How can road safety be improved?
- The score within the SA/SEA for the criteria 'will it reduce the number of road traffic accidents and improve safety?' should be negative. It is acknowledged that additional traffic could result in road safety concerns due to width of roads and lack of footpaths. Surprising that it is noted that 'development has the capacity to improve road safety' without any evidence. Without mitigation, development would have a negative impact on sustainability.
- Disagreement with the positive score within the SA/SEA for the criteria 'will it increase travel choice?'. Lack of footpaths, distance to public transport, increased traffic movements and associated hazards to pedestrians/cyclists will not promote or improve opportunities.

Site promoter comments:

- Additional traffic movements resulting from the development would only have a marginal impact on the highway network. In respect of concerns raised about the narrowness of some of the roads in the surrounding area to the site, the landowners will be commissioning transport assessment work to assess what effect the additional traffic could have on these roads and suggest any necessary mitigation measures.

Council response:

The Council's Highways and Transport team have raised serious concerns. The roads surrounding the site are often narrow and may be unsuitable for additional volumes of traffic. It is not possible to widen the roads unless third party land is obtained to enable this. The highways issues with the site are a constraint to the delivery of the site.

The issues of construction traffic would be dealt with at the planning application stage and would be dealt with through planning conditions should the site be allocated for development.

The study referred to was undertaken in 2008 and it considered the Pangbourne Hill/Tidmarsh Road junction. It is a publically available document.

The Council's Highways and Transport team has advised that 36 houses would generate around 216 daily vehicle movements, including 22 during the 08:00 to 09:00 peak.

The cumulative impact has not been considered because the aforementioned highways issues to the site make the site unsuitable for development.

Comments about Courtlands Hill and Green Lane being unadopted roads noted. This is not a planning matter.

The Council's Highways and Transport team has advised that access can be obtained via Bere Court Road onto Pangbourne Hill and via Green Lane onto the A340 onto Tidmarsh Road. However, they have raised concerns that the roads are often narrow surrounding the site and may be unsuitable for such additional volumes of traffic. Furthermore, they have advised that there are no footways in the vicinity and it will not be possible to provide any. This is a further constraint to the delivery of the site.

The Council has commissioned Transport Assessment (TA) work to assess the impact that development of the shortlisted preferred option sites would have upon the highway network. As a worst case scenario, the development of all of the shortlisted sites has been considered. The TAs indicate that the sites themselves are unlikely to have a significant impact on the highway network, meaning that there will be limited impact on local congestion.

Road safety improvements would be considered as part of a Site Transport Assessment at the planning application stage.

Comments about disruption to traffic on Green Lane due to banking, hedges and overhanging trees result in disruption on Green Lane noted.

An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

Comment about the 7.5 tonne weight restriction on Green Lane being ignored noted.

Comment about Bere Court Road is designated as a 'quiet lane' by the Countryside Initiative and supported by the Department of Transport noted.

The centre of the site is approximately 1.3km (via Green Lane) and 1.2km (via Pangbourne Hill) from Pangbourne Railway Station, which is within the Chartered Institute of Highways and Transportation's (CIHT's) "acceptable walking distances" for commuting or travel to school which is set at 2km (CIHT, 2000). The Council's Highways and Transport team has advised that nearby Pangbourne Hill has a limited bi-hourly bus service to places such as Reading. All other bus services are up to 900m away which is not considered ideal.

The Council's Highways and Transport team has advised that it is not possible to provide any footpaths. Road Safety improvements would be considered as part of a Site Transport Assessment at the planning application stage.

Comment that the Council has duty of care to minimise the risk of accidents through its planning decisions noted.

Parking

Consultation comments:

- Insufficient parking in Pangbourne for residents.
- An increase in traffic will bring an increased demand for parking in Pangbourne. Will additional parking facilities be provided to take account of the increase in residents?
- Limited parking at Pangbourne railway station. An increase in residents could create parking problems in Pangbourne village.

Council response:

Previous parking policies to restrict the amount of parking provided in new developments have caused a number of issues in terms of overspill on-street parking and conversion of front gardens to parking spaces. As a result, new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

The new parking standards also seek to ensure the delivery of good quality neighbourhoods with the level of parking required linked to the area and its accessibility and to the type of housing to be provided.

The issue of parking at Pangbourne station is noted. Policy ADPP5 (North Wessex Downs AONB) of the Core Strategy identifies that facilities at Pangbourne railway station will be improved in partnership with First Great Western; including additional parking where possible.

Public transport

Consultation comments:

- Infrequent bus service, eg. 2 hourly from Pangbourne Hill to the centre of Pangbourne and Reading, which is dependent upon subsidy from the Council.
- Overcrowded trains – 8:03 from Pangbourne to London Paddington 3rd most overcrowded train in Britain.
- The SA/SEA does not mention the bi-hourly bus service is heavily dependent upon subsidy from the Council.

Site promoter comments:

- Site is well related to existing services and facilities within Pangbourne including a train station with services to London, Oxford and Reading and an hourly bus service.

Council response:

Development could provide an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Comments about overcrowding on trains noted. Railway capacity issues are not within the remit of this consultation.

Walking and cycling

Consultation comments:

- Development would fail to protect and enhance public rights of way – right of way exists as a gated and maintained track along the eastern boundary of the site, and the public right of way that runs from the junction of Bere Court Road and Green Lane along the boundary of the site will need to be realigned which would necessitate the compulsory purchase of land or removed.
- The sites location will not give rise to opportunities for walking and cycling – lack of footpaths, lack of street lighting, distance to public transport, gradients of nearby roads, narrow road widths.
- The concerns raised by the Council's Highway and Transport team in the site assessment around the lack of footpaths are not addressed in the proposals.
- Recent so called 'improvements' (pedestrian island at the bottom of Pangbourne Hill, resurfacing of the pavement on Pangbourne Hill) undertaken in preparation for a planning application to show pedestrians being catered for thereby ensuring its subsequent 'rubber stamping' approval.

Council response:

The Council's Highways and Transport team have advised that it will not be possible to provide any footways in the vicinity of the site. This results in issues around the suitability of the site.

Should a site, which has a public right of way across it, be allocated, then the public right of way would need to be protected. Such a requirement would be included in the site specific policy supporting the allocation.

The highways works mentioned were not undertaken in preparation of a planning application. Any site that is allocated will need to be subject to a planning application which will be considered against the Development Plan for West Berkshire.

13. Infrastructure

Consultation comments:

- If deliverability is compromised by deficiencies in infrastructure, development cannot go ahead.
- Existing infrastructure at capacity and development would create additional pressure.
- Services received by existing residents will be degraded.
- Impact on infrastructure (schools, GP services) not considered.
- Impact on social services.
- Services in Pangbourne well used by neighbouring villages, eg. Upper Basildon, Whitchurch.
- The site is the farthest point from Pangbourne villages and its services.
- No indication that PAN001 will provide any improvements to community infrastructure.
- Disagreement with the positive score within the SA/SEA for the criteria 'to safeguard and improve accessibility to services and facilities'. The primary school is located at the opposite end of Pangbourne to the site, economic benefits cannot be assessed until long after the completion of development, and limited local job opportunities will result in reliance on commuting.

Council response:

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

Comments that services in Pangbourne used by neighbouring villages are noted.

Amenity/play areas:

Consultation comments:

- No amenity or play area within 800m of the site.

Council response:

There are no prescribed distances between residential development and local play facilities. Local play facilities could be provided on the site, should it be allocated. The Council's Quality Design Supplementary Planning Document requires that gardens of family dwellings are large enough for children's play.

Education:

Consultation responses:

- Impact on nursery schools.
- Impact on schools – Pangbourne Primary School full in Key Stage 1 so no guarantee of place for children of new residents. Pressure on primary schools in West Berkshire and Reading has resulted in schools having to accept bulge year groups or expand. This will have a knock on effect on secondary schools.
- Pangbourne Primary School needs to be enlarged.
- Local primary at opposite end of Pangbourne to site – incorrect for SA/SEA to state that the site is close to areas of education.
- Incorrect statement within the 'site selection – site commentary' section of the SA/SEA that Pangbourne Primary School at capacity. Not all classes are presently full; however this situation could change by the time development takes place.

Council response:

Consultation with the Local Education Authority has indicated that a drainage culvert runs through the primary school site which limits the capacity for the school to expand. However, they have not indicated that this is a showstopper for future development.

Healthcare:

Consultation comments:

- Impact on GP services and adult care. Additional demand could not be met by the GP practice.
- GP practice needs to be enlarged.
- Long waiting times to see GPs – this would increase with a larger population.

- Dentists could not support additional demand.

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan.

Utilities

Consultation responses:

- There is no evidence to show that the Council has assessed the quality and capacity of infrastructure for water supply and waste water and its treatment.
- Thames Water concerns in respect of water supply and wastewater capability.
- Sewage system could not support additional development without a costly major infrastructure project that would result in severe disruption to Pangbourne for many months. There is no indication that Thames Water are prepared to make the necessary investment to allow upgrades. Sewage flooding has already occurred at the bottom of Pangbourne Hill and Courtlands Hill, and there is the potential for wastewater contamination of the trout rich River Pang and River Thames.
- Sewerage issues not covered in 2011 Landscape Sensitivity Assessment.
- Thames Water has commented that the current water supply network would be unable to support demand from PAN002 and/or PAN002, requiring a water supply strategy and yet more infrastructure investment.
- SA/SEA glosses over the sewerage issues.
- Gas and electricity supplies would need to be increased.
- Poor state of underground gas pipes reported.

Council response:

Consultation has taken place with Thames Water and they have not indicated any water supply problems.

In respect of sewerage, they have identified that the capacity of the pumping station as a key issue.

A Duty to Cooperate meeting was held with Thames Water on 12 May 2015. Thames Water explained the background to their comments made during their preferred options consultation. Thames Water advised that under the Water Industry Act developers have an automatic right to connect to the sewer; this can be addressed at the planning policy stage by asking for a drainage strategy and then later by asking for conditions at the planning application stage.

It was agreed that the way forward would be that the policy for each individual site allocated will ask that an integrated strategy for water and wastewater is prepared to support a planning application and that this should cover flood risk, water quality and conservation. The strategy would need to be clear how a solution would be delivered to any concerns identified as the development came forward. This could

then be applied to all sites, regardless of whether concerns have been raised by Thames Water to date.

14. Landscape/setting

Consultation comments:

- Contrary to national and local planning policy, eg. paragraphs 115, 116, 123 of the NPPF, Core Strategy policies ADPP1, ADPP5, CS4, CS14 and CS19, Quality Design SPD, and the Pangbourne Village Design Statement.

AONB:

- Development would have a detrimental impact upon the AONB and devalue their concept. The site contributes highly to the characteristics of the AONB.
- Visual impact of development upon the AONB could not be mitigated against.
- Any form of mitigation incompatible with the Core Strategy's emphasis on protecting the natural beauty of the landscape.
- Mitigation measures will not remove the concerns that development would have a potentially negative impact on environmental sustainability.
- Setting of precedent for further development within the AONB.
- Government guidance requires the refusal of planning applications for major developments within the AONB.
- The Council has indicated that policies relevant to the AONB are no longer being well enforced.
- Planning history – appeal for site dismissed and Inspector commented there would be an unwarranted intrusion into the AONB.
- Settlement pattern within the AONB should be maintained to retain the character of villages/towns.
- The site should only be developed if the recommendations of the Landscape Sensitivity Assessment (LSA) are adhered to, however a full Landscape Visual Impact Assessment will be expected with any planning application.
- Landscape work undertaken by the North Wessex Downs AONB at the time of the Core Strategy hearings (LMS March 2011) rejected the site as being unacceptable in landscape terms.
- 2011 Landscape Sensitivity Assessment (LSA) out of date, factually flawed and contradictory. It therefore cannot form the basis of a robust evidence base that is needed to support the suitability and availability of the site. Nor can it be relied upon to form the basis for the SA/SEA conclusions.
- Errors reported with the LSA:
 - The LSA includes 'Jesmond Paddock' and part of 'Jesmond Hill' within the site area, but the preferred options document does not.
 - Photographs (p.65):
 - Inaccurate description – photograph taken 25-30m from inside the field from the junction of Green Lane and Courtlands Hill, not from the 'Courtlands Road' as stated.
 - Relationship with adjacent settlement (p.66):
 - Reference to the Breedon Estate is irrelevant as the Breedon Estate sold the land in 1894.

- The reference to the area being semi-rural is contradicted by the Council who refer to the area as rural.
 - Site is not enclosed by tree belts and garden along Bere Court Road.
 - The described hedgerow boundary on the north western side of the site does not exist.
 - No tree belt or hedgerow on the eastern boundary of the site which backs on to the rear gardens of Flowers Hill.
 - Green Lane which borders the north of the site is not mentioned.
- Relationship with wider adjacent countryside (p.66):
 - Site is not located on the valley side slopes of Jesmond Hill.
- Impact on key landscape characteristics (p.66):
 - Incorrect that there would be no loss of woodland or herb rich pasture – trees (including nine oaks) and mature hedgerow along Green Lane would be lost.
- Impact on key visual characteristics (p.66):
 - Site is not visually enclosed. It is completely exposed when viewed from the south and west, and partially from the north and west.
 - Localised impact on views to the North Wessex Downs AONB *not* the Chilterns AONB.
 - No mention that the views from the south, south east and from the properties on Flowers Hill that border the site are impacted and are critical to the protection of the AONB.
 - Disagreement that development would not fragment the open hillside.
- Impact on key settlement characteristics (p.66):
 - The site area now excludes ‘Jesmond Paddock’ and part of ‘Jesmond Hill’ so development would fail to link to the built form of Jesmond Hill.
 - Green Lane is a gateway into the village. Additional traffic movements from development would destroy the character and sense of tranquillity thereby harming the gateway.
 - The site would compromise the compactness of the village because it is beyond the settlement boundary.
- Summary of compliance with PPS7 paragraph 21 (p.66):
 - Disagreement that there would be little harm to the AONB. This statement contradicts the ‘summary of characteristics’ (p.64) which advises of the importance of protecting the character of rural lanes, gateways to Pangbourne and the sense of tranquillity.
- Issues not covered in the LCA:
 - No consideration of access – the construction of an entrance on Green Lane would alter the character of Green Lane.
 - No mention of drinking troughs for animals.
 - No mention of the substantial brick built farm within the south east corner of the site which indicates agricultural use.
 - Loss of 4.4 acres of open hillside is not ‘small’.
 - Historic impact not mentioned – Green Lane an ancient track that was used by the Monks of Reading Abbey to access their retreat at Bere Court.

Site promoter comments:

- 50 dwellings is often seen as the threshold in terms of whether a residential scheme is or is not 'major development'. The site is therefore not subject to the exceptions test in paragraph 116 of the National Planning Policy Framework.
- 2014 Landscape Character Assessment of potential sites within the AONB shows that development on the site would be acceptable subject to mitigation measures.

Setting and character:

Consultation comments:

- Previous refusal reasons for development on the site are supported by existing national and local planning policy (NPPF, Core Strategy) which reinforce the need to conserve the character of PAN001.
- The proposed density, reduced plot sizes and number of dwellings would not be in keeping with the existing character and pattern of development in Pangbourne, ie. detached dwellings in large plots, and it would undermine the soft transition into the open countryside.
- Proportion of affordable housing required would conflict with the character of the area.
- The nature and scale of improvements necessary to facilitate development would have an adverse impact on the local character and amenity.
- Introduction of street lighting would impact on the character of the area.
- The site provides an important green edge to the established character of Pangbourne
- Urbanisation of land towards Tidmarsh.
- Loss of rural views.
- Loss of tranquillity.
- Development would have little effect on the appearance of the village or its extent. The site is not obviously an area of outstanding beauty or note.

Council response:

All development will be of a high quality and sustainable design that respects and enhances the character, appearance and landscape of the wider area. This is a requirement of the policies within the Council's Core Strategy.

All sites within or adjacent to the AONB have had a Landscape Capacity Assessment (LCA) carried out. The LCA considered topography, visual prominence and the setting of the sites.

The assessment has indicated that development on the site will be acceptable subject to certain mitigation measures to reduce the potential impact on the AONB. Protection of the AONB is paramount, and where a site was considered to cause harm to the AONB it was not included within the Housing Site Allocations Development Plan Document Preferred Options.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 (Design Principles) of the Core Strategy and the Quality Design Supplementary Planning Document.

Comments made in respect of the LSA are noted. The Council's landscape consultant has provided comments on the issues raised in respect of the LSA as follows:

Section	Comment	Response
Assessment of Settlement and Key Landscape, Visual and Settlement Characteristics	There is no assessment of the Landscape Sensitivity of the AONB land surrounding the settlement.	The overall landscape sensitivity of the AONB is taken as high. The characteristics of the landscape around the settlements is described within the text and extracts from the North Wessex Downs AONB Landscape Character Assessment 2002 and other documents
Relationship with adjacent settlement	Add: The western sections of the site include two substantial properties in mature landscape grounds.	It is agreed that the following bullet point should also be taken into consideration as part of the site's relationship with the adjacent settlement: <ul style="list-style-type: none"> • The western sections of the site include two substantial properties in mature landscape grounds.
Relationship with wider countryside	Add: The site lies close to the crest of the ridge and falls away to the south. This land flows into the wider countryside and is important in providing the setting to the settlement.	The site is on the higher ground close to the ridge. However PAN001 predominantly falls to the east and is not part of the larger area of open land falling to the south which it is agreed forms the setting of the settlement.
Impact on key landscape characteristics	Add: The mature landscape grounds are important to the setting of the existing properties within the development site. It is not clear whether these existing properties would be retained.	Retention of the existing properties will depend on the nature of any scheme submitted for PAN001. Retention is not considered essential to any development proposals for this site. The mature grounds contribute to the character of PAN001 and would be

Section	Comment	Response
		covered by the recommendations.
Impact on key visual characteristics	Add: Although the site is located close to the crest of the ridge it is only visible in filtered views from land to the south (for instance from Tidmarsh Lane). The existing Pangbourne School dominates these views.	It is agreed that the following bullet point should also be taken into consideration as part of the site's key visual characteristics: <ul style="list-style-type: none"> Although the site is located close to the crest of the ridge it is only visible in filtered views from land to the south. The existing Pangbourne School dominates these views.
Impact on key settlement characteristics	Add: The surrounding development comprises large, individual dwellings. Development including areas of social housing would contrast strongly with the character of the adjacent residential areas.	The recommendations require the character of Bere Court Road and views of the site to be respected and protected which will limit the density, mass and scale of development.
Summary of compliance with PPS 7 paragraph 21	Amend to: Development would result in the loss of an area of open countryside and would impact on the setting to the existing houses (assuming these are to be retained). Although located close to the crest of the ridge the site is not prominent in views from the wider countryside. The existing site does not contribute to a high degree to the natural beauty of the AONB. Development would not impact on the conservation of the AONB but would need to incorporate measures to enhance the special landscape qualities of the AONB	It is agreed that although located close to the crest of the ridge the site is not prominent in views from the wider countryside. The existing site does not contribute to a high degree to the natural beauty of the AONB. Development would not impact on the conservation of the AONB but would need to incorporate measures to enhance the special landscape qualities of the AONB.
Recommendations	Development could be carried out subject to the conditions described in the Kirkham/Terra Firma report.	Noted
Conclusions and observations on	Agree on potential number of dwellings at PAN001.	Noted

Section	Comment	Response
cumulative impacts of PAN001 and PAN002	PAN002 should not be included as a potential SHLAA site due to access difficulties and scale of development recommended in the 2011 study.	It is considered that PAN002 does have the potential for development subject to the constraints set out in the 2011 report. Any final numbers will depend on detailed landscape and visual assessments of the site.

Comment	Response
Development on the site would not link to the built form at Jesmond Hill as this area is excluded from the site boundary in the preferred options document. The site is not located on the valley side slopes of Jesmond Hill. The site is not enclosed by tree belts and garden along Bere Court Road.	The site that was assessed in the LSA (2011) was a larger site than that being considered as part of the preferred options consultation. The larger site included the valley side slopes of Jesmond Hill.
Site described as not being visually enclosed – the site is completely exposed when viewed from the south and west, and partially from the north and west. No mention that the views from the south, south east and from the properties on Flowers Hill that border the site are impacted and are critical to the protection of the AONB.	The site is on the higher ground close to the ridge. However PAN001 predominantly falls to the east and is not part of the larger area of open land falling to the south which forms the setting of the settlement. Although the site is located close to the crest of the ridge it is only visible in filtered views from land to the south and is not prominent in views from the wider countryside. The existing site does not contribute to a high degree to the natural beauty of the AONB. Development would not impact on the conservation of the AONB but would need to incorporate measures to enhance the special landscape qualities of the AONB. Recommendations require the protection of views from the east and north east.
Green Lane which borders the north of the site is not mentioned.	It is agreed that Green Lane also runs along the northern border.
There is no tree belt or hedgerow on the eastern boundary of the site which backs on to the rear gardens of Flowers Hill.	The site is separated from the back gardens of the Flowers Hill properties by a grassy track which is bordered by a mature hedgerow along the eastern boundary of the site.
Localised impact on views to the North Wessex Downs AONB <i>not</i> the Chilterns AONB.	The reference here is to views north-east over the site to the distant Chilterns AONB.
Incorrect that there would be no loss	The recommendations require the retention

of woodland or herb rich pasture – trees (including nine oaks) and mature hedgerow along Green Lane would be lost. There are significant trees on the site, and the site has been used to graze cattle. Other species have been observed on or adjacent to the site.	of on site trees.
Photographs are inaccurate in the description of where they have been taken – the photograph of the site was taken 25-30m from inside the field from the junction of Green Lane and Courtlands Hill, not from the 'Courtlands Road' as stated.	The photograph was taken into the site from the gate at the entrance to the grassy track along the eastern boundary of the site, close to the junction of Green Lane and Courtlands Hill. Courtlands Road should correctly read Courtlands Hill.
There <i>would</i> be a historic impact – Green Lane is an ancient track that was used by the Monks of Reading Abbey to access their retreat at Bere Court.	The LSA used data that was taken from the Council's Historic Landscape Characterisation for West Berkshire and Historic Environment Character Zoning.
The LSA describes the area as 'semi-rural' in character, whilst the Council describes it as 'rural'.	The LSA specifically refers to the character of the housing only.
No mention of the substantial brick built farm within the south east corner of the site which indicates agricultural use.	The brick farm building was not visible from a public viewpoint but the agricultural use of the eastern part of the site is described in the assessment and illustrated in the photograph of PAN001.

15. Open space

Consultation comments:

- Proposal is contrary to Core Strategy policy CS18 – developing the site will destroy the green infrastructure behind Green Lane.

Council response:

Should the site be allocated and a planning application subsequently submitted, development on the site would need to meet the requirements of the Green Infrastructure policy (CS18) of the Core Strategy and saved policy RL.1. Details of open space provision, ie. location, would be subject to more detailed work at the planning application stage.

16. Personal

Consultation comments:

- Impact of construction (dust, noise and traffic) on quality of life.
- Impact of development on quality of life.

Council response:

It is acknowledged that construction works can result in temporary disturbance.

A certain amount of noise is to be expected in most types of construction and cannot be completely prevented. The Council can serve a notice imposing requirements as to how construction works should be carried out to minimise noise and disturbance. The notice can cover working hours and noise limits.

National Planning Policy Guidance requires planning policies and decisions to not undermine quality of life. Policy CS14 (Design Principles) of the Core Strategy requires that all new development must make a positive contribution to the quality of life in West Berkshire. All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on social, environmental, and economic factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

17. Pollution

Consultation comments:

- Noise during construction period.
- Increased traffic would result in an increase in air pollution.
- Light pollution – currently no street lighting and the night sky is visible. This could not be mitigated against.
- SA/SEA ‘will it reduce omissions contributing to climate change and ensure adaptation measures are in place to respond to climate change?’: Claim that mitigation measures could lead to a neutral impact has resulted in unspecified traffic plans to reduce car traffic. If such plans include restrictions on motor vehicle access to Bere Court Road and Green Lane, then this would be unenforceable and ineffective. Other roads would become rat runs.

Site promoter comments:

- No known noise, air or contamination issues within the site.

Council response:

A certain amount of noise is to be expected in most types of construction and cannot be completely prevented. The Council can serve a notice imposing requirements as to how construction works should be carried out to minimise noise and disturbance. The notice can cover working hours and noise limits.

Generally the acceptable hours for noisy work within the district are limited (8am – 6pm Monday to Friday and 8.30am – 1pm on Saturdays. For particularly noisy work, it might be necessary to restrict these times further.

All development proposals will be expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 (Sustainable Construction and Energy Efficiency) of the Core Strategy DPD.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution.

18. Principle of development

Consultation comments:

- Development would be contrary to national and local planning policies – paragraphs 12, 14, 47 of the NPPF, policy ADPP5 of the Core Strategy, and the Pangbourne Village Plan.
- Pangbourne Parish Council's comments in the SA/SEA claim that they might be in favour of smaller developments on PAN001 and PAN002. This was an informal remark to the effect that *if* it was ultimately decided to proceed with one or both of these developments, the Council would prefer smaller numbers than those envisaged in the current proposals. Until the final decisions as to which sites go forward, Pangbourne Parish Council does not wish to speculate on what its reaction might be.
- Development could have a negative impact upon sustainability in relation to land use efficiency.
- Previous applications/appeals/promotion for allocation rejected – set precedents have been ignored.
- Shortfall in numbers does not make the site suitable.
- Assumed that a shortage of land has resulted in the selection on the site.
- Lack of evidence to support the allocations in Pangbourne – alternative sites should be considered.
- Approach unsound – sites within the AONB should not be automatically identified through the DPD process, sites within the AONB should only be considered when all other land has been considered, rural service centre designation does not guarantee there is capacity for future large scale development, geographical constraints in Pangbourne preclude against development so the approach of the Local Plan should be to consider other areas of the AONB.
- If deliverability of PAN001 and PAN002 is compromised, then Pangbourne's status as a rural service centre, where some growth is expected, would oblige the Council to have to issue another call for sites in or outside of the settlement boundary from local developers.
- Proposed contribution of housing in Pangbourne equates to over 3% of the population, the highest of all the small settlements. The Eastern Area contributes to 30% of the total required. The EUA contributes to a very high proportion of the total required. The call on this sensitive area is out of step with the rest of West Berkshire.
- Disproportionate amount of development proposed for the east of the district compared to other areas, eg. Thatcham.
- Recognition of need for housing, but sites selected are unsuitable.
- Development would set a precedent.

- Deliverability of the site uncertain due to facts and circumstances relating to the timing of the proposed development from the point of view of the owners.
- Cumulatively PAN001 and PAN002 will represent significant additional development in Pangbourne.
- Whilst there is a greater cost to developers of developing former industrial sites, the cost to local residents is irrevocable and permanent as fields are lost and settlements coalesce.

Site promoter comments:

- Support for inclusion of site as a preferred option.
- The site is available, deliverable and suitable for development.
- Land is available immediately for development.
- No un-neighbourly uses near the site due to the site being located on the south eastern edge of the settlement with residential to the north and east. Residential development would be an appropriate use.

Council response:

The site is has been submitted to the Council for inclusion within the Strategic Housing Land Availability Assessment (SHLAA), and therefore, it is acceptable to consider the site for development.

The Core Strategy allocates strategic development sites, and the role of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic housing sites across the district.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

All comments made through the preparation of the DPD process are available to the Inspector at the DPD Examination.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered.

The Core Strategy makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary, therefore the HSA DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

The SA/SEA has been updated to include the revised comments from Pangbourne Parish Council.

Settlement boundaries will be redrawn around any sites that are allocated to protect those areas outside of the new boundary from development.

Alternative locations:

Consultation comments:

- Priority of using brownfield sites not being fully exploited. Has the Council analysed their own land ownership in detail to ensure brownfield land can meet housing targets?
- Brownfield sites available, eg. Pangbourne, Theale, A4 corridor between Newbury and Theale, former industrial sites, Pangbourne police station under used, Council has brownfield sites.
- Suitable plot of land for sale in Tidmarsh that backs on to the main road and is closer to the M4 than PAN001.
- Have the owners of Horseshoe Park in Pangbourne approached about future development of the site for residential use?
- A larger area of THE003 should be considered.
- Areas that are within close proximity of employment. This will reduce carbon emissions.
- Urban conurbation Reading and the M4.
- Ribbon development between Pangbourne, Purley and Tidmarsh.
- Other sites in appropriate locations, eg. adjacent to the motorway, less visible, adjacent to existing residential areas.
- The Council should consider the younger generation and allocate sites that have accessibility to rail, bus, airports and major highways to towns. Why has this not been done?
- Sites of less than 10 dwellings and the redevelopment of existing houses and gardens have not been considered.
- Obligation on the Council to consider the likelihood of extra homes created by windfall sites (eg. infill, re-use of empty homes, conversion from non-residential buildings, redevelopment of existing houses to provide the more efficient use of land).

Council response:

Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

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 new homes". In other spatial areas the windfall allowance is that included in the five year housing land supply.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing. Work on a new Local Plan, which is due to commence following the adoption of the HSA DPD, will include a holistic review of employment land.

Housing need:

Consultation comments:

- What evidence is there to suggest that there is a strong demand for more houses in Pangbourne?
- Pangbourne has met its requirement for providing additional housing through recent infill development.
- Geographical constraints and a lack of infill development sites in Pangbourne have resulted in a shortage in supply of suitable sites for housing. The two preferred options are required to meet needs.

Housing numbers:

Consultation comments:

- Understood that the housing requirement for the AONB is still under review.
- While recent projections (2010) from the DCLG indicate that a revised target of 16,000 houses may be needed, the existing requirement for 10,500 is still driving policy.

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the AONB would be able to take the amount of development proposed.

The Core Strategy was adopted following the publication of the National Planning Policy Framework (NPPF). The Council is now required by national policy set out in the NPPF to meet the 'objectively assessed needs' of the area. Work is underway in partnership with other local authorities to establish how much housing West Berkshire will need in the future through the production of a Strategic Housing Market Assessment (SHMA).

The first part of the future housing requirement is being met through the preparation of the Housing Site Allocations DPD which will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy, with some additional flexibility around these numbers.

Once the DPD has been adopted, the remainder of the future housing requirement will be met through the preparation of a new Local Plan which will allocate additional development and look longer term to 2036, as well as dealing with other policy issues.

Identification of sites:

Consultation comments:

- Process for identifying sites flawed and not in the best interests of the public. The 'call for sites' would not have resulted in the assessment and selection of all possible available sites. The method used would capture contentious/undesirable sites that may have failed to be developed in the past for valid reasons. The starting point should be 'where are the best places for development', and the Council should contact the landowners of suitable sites.
- Has the Council advertised for available land?
- Were all landowners aware of the 'call for sites'?
- Unclear whether all potential sites for development within the settlement boundary have been considered. In the last 5 years 60 houses have been built and more are under construction. Whilst alternatives have been suggested by local residents, the initiative lies with owners and not the Council.

Council response:

The sites set out in the Preferred Options DPD are based upon sites put forward to the Council for the SHLAA (the SHLAA is a technical document that informs the development plan process and provides background evidence on the possibility of available land within). The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been put forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While there may be other, these may not be available, e.g. they may not have been submitted to the Council through the SHLAA or are not in accordance with the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

Site selection process:

Consultation comments:

- The site would not have been allocated had the assessment been carried out more assiduously.
- Sites should not be assessed in isolation from one another, without looking at the impact on the whole area.
- Site selection and evaluations inconsistent – PAN009 and PAN010 have been rejected for reasons that apply to PAN001, eg. same distance from Pangbourne as PAN009, far greater access constraints to PAN001, and the impact on natural beauty of the landscape far greater than at PAN009/PAN010. Other sites in the district have been rejected for reasons that apply to PAN001.
- Search criteria have focused on ensuring an even distribution of allocations rather than a diligent and thorough review of where allocations would be best suited. This is evidenced by suitable sites in Compton being rejected because the Pirbright institute has been allocated. There is a need for consistency in the Council's approach to prevent the risk of legal challenge.

Council response:

The relationship to the surrounding area and other potential neighbouring sites has been taken into consideration in the assessment of sites, and this consideration is included within the 'site selection – site assessment' section of the SA/SEA.

Unlike PAN001, both PAN009 and PAN010 were assessed as 'not currently developable' within the Council's SHLAA, and were therefore not considered any further for allocation. The primary consideration for both PAN009 and PAN010 was the impact that development would have upon the AONB.

The Landscape Capacity Assessment (LCA) for PAN009 advised that there would be significant harm to the natural beauty and special qualities of the AONB and the site should not be pursued further as a housing allocation. Site PAN010 was not subject to a LCA because it was assessed as 'not currently developable' within the Strategic Housing Land Availability Assessment (SHLAA) as a result of having a poor relationship to the existing settlement. Sites assessed as 'not currently developable' were automatically excluded from being assessed further for possible allocation within the Housing Site Allocations DPD. its location outside of the settlement boundary. The LCA for PAN001 advised that development on the site will be acceptable subject to subject to certain mitigation measures to reduce the potential impact on the AONB

Other issues raised for PAN009 included the poor relationship to the settlement and the potential for access to be a constraint. For PAN010, other issues included the location of the sites within a Local Wildlife Site.

The Council's Core Strategy sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The purpose of the Housing Site Allocations DPD is to

implement the framework of the Core Strategy by allocating non-strategic sites across the district.

The site assessment process focused on sites that had been assessed as 'potentially developable' within 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 and local planning policy, and focus on all aspects of sustainability.

In accordance with Core Strategy policy ADPP5, the service village of Compton has some limited development potential and the site that has been shortlisted for allocation (COM004) is an available brownfield site and opportunity site which would deliver a greater level of development than that normally expected for service villages. The re-use of brownfield land is a priority in national and local planning policy taking precedent over greenfield sites. COM004 is available and brownfield which was a principle reason for rejecting available greenfield sites in Compton.

19. Settlement boundaries

Consultation comments:

- Development will breach the settlement boundary – contrary to national and local planning policy, eg. NPPF (paragraph 80), Core Strategy (policy CS1), HSG.1, ENV.4, Pangbourne Village Plan.
- Policies relevant to the settlement boundary no longer well enforced.
- Redrawing settlement boundaries sets a precedent and goes against the purpose and value that they provide. Potential for sprawl to Tidmarsh and beyond and the loss of the rural identities of Pangbourne and Tidmarsh.
- Altering the existing settlement boundary around the proposed site will mean there is no clear boundary – precedent for further development could be set.
- No mention of further consultation or process of the review of settlement boundaries.

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation. There is no designated greenbelt in West Berkshire.

20. Sustainability

Consultation response:

- Proposal contrary to the Delivering Investment from Sustainable Development SPD – development will not provide appropriate social, economic and environmental benefits to the community as a whole, and the impact on existing residents will be significant.

Council response:

The SPD ceased to exist following the implementation of the Community Infrastructure Levy on 1 April 2015.

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. The assessment of this site did not result in any significant impacts on sustainability. The SA/SEA can be viewed at:

<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38059&p=0>.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

PAN002: Land at north of Pangbourne Hill and west of River View Road, Pangbourne

Comments received: 132

A petition objecting to the development of both PAN001 and PAN002 for housing with 217 signatures was submitted to the Council.

It should be noted that a hybrid planning application (ref: 14/03135/OUTMAJ) comprising of (i) an outline application for 35 dwellings and combined public amenity space / play area with all matters reserved; and (ii) a full application for the principal means of pedestrian and vehicular access off Pangbourne Hill, a new footway, engineering and landscaping works along the Pangbourne Hill frontage, and car park to serve Pangbourne Cemetery was refused planning permission on 29 April 2015.

1. General

Consultation comments:

- Adverse impact on the local environment.
- Impact on local amenity.
- Property on Riverview Road has already had overdevelopment around the property's boundaries. Development of PAN002 will add to the overdevelopment.
- Impact on existing properties around PAN002.
- Development will harm the harmony and peace of the cemetery, impacting on mourners and visitors.

Council response:

Securing a good standard of amenity is one of the core planning principles of the National Planning Policy Framework (NPPF). Policy CS14 (Design Principles) of the Core Strategy requires that all development will be of a high quality and sustainable design that respects and enhances the character, appearance and landscape of the wider area. It also states that new development must make a positive contribution to the quality of life in West Berkshire. The Council's Quality Design Supplementary Planning Document provides guidance on the impacts of development on neighbouring living conditions.

The impact of development on neighbouring amenity is an issue that would need to be considered at the planning application stage, should the site be allocated and a planning application submitted.

Consultation comments:

- Strong sense of community will be lost as a result of development.
- Development will benefit retail outlets, which are already suffering.
- Overpopulated area.

- Pangbourne Hill full.

Council response:

Comments noted.

Consultation comments:

- Ill-conceived proposal.

Council response:

The site assessment process focused on sites that had been assessed as 'potentially developable' within the Strategic Housing Land Availability Assessment (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 and local planning policy, and focus on all aspects of sustainability.

Consultation comments:

- Development will only benefit the landowners, developers and anyone on the payroll.
- Consideration has only been given to those who will profit from development.
- Impact of development on property prices.
- Long construction periods.

Council response:

The issues identified are not material considerations in the planning process. A material planning consideration is one which is relevant to making the planning decision in question, eg. whether to grant planning permission or not. In general, material considerations are concerned with land use in the public interest, so the protection of purely private interests such as the impact of development on the value of a property or loss of private rights to light could not be material considerations.

Consultation comments:

- Brownfield sites require greater groundworks and incurred costs before they can be built. Developers would rather reap the benefit of greater profit without the expense of rendering a site suitable.

Council response:

Comments noted. Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary.

Consultation comments:

- Development will not bring any benefits to the residents of Pangbourne.

Council response:

New facilities/services as a result of development would also benefit the existing community.

Consultation comments:

- Pangbourne cannot be enlarged due to its geography.

Council response:

Policy ADPP5 of the Core Strategy recognises that whilst there are some opportunities for growth in Pangbourne, those outside of the settlement boundary are partly constrained by environmental factors, eg, the floodplain and the sensitivity of the landscape.

Consultation comments:

- If development goes ahead, will Gypsies and Travellers have the same rights to re-apply for development? Appears that different rules are being applied to planning developments, ie. travellers versus millionaire developers, despite the issues being the same, eg. impact on the AONB, outside settlement boundary.

Council response:

The National Planning Policy Framework (NPPF) makes clear that the starting point for all decision making is the development plan. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The current development plan for West Berkshire comprises of the West Berkshire Core Strategy (2006-2026) Development Plan Document (DPD) and the Saved Policies of the West Berkshire District Local Plan 1991-2006.

The Housing Site Allocations DPD will form part of the development plan when it is adopted. The DPD can only be adopted after it has been examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

Sites to accommodate the identified need for Gypsies, Travellers and Travelling Showpeople have also been allocated and the approach is explained in the DPD. Policy CS7 of the Core Strategy sets out a framework for identifying these sites.

Consultation comment:

- Risk of subsidence from development.

Council response:

Comments noted.

2. Affordable housing

Consultation comments:

- 40% affordable housing would have to be provided on the site. The distance of the affordable housing away from the centre of Pangbourne will be problematic to the residents of these houses, particularly as there is a lack of footways into the village.
- Proposed homes will not be affordable because the site is not brownfield.

Council response:

Should the site be allocated and a planning application subsequently submitted, then provision of affordable housing would be required in line with Core Strategy policy CS6 (provision of affordable housing).

3. Consultation process

Consultation comments:

- Consultation process and timing inappropriate – consultation took place over the summer holiday period, only those within 100m of shortlisted sites were consulted, letters were marked ‘to the occupier’ and could have been mistaken for junk mail, letters received after the consultation start date, incorrect naming of the site delayed alerting people, lack of formal public meeting with planning officers in attendance. This indicates that the Council are trying to push through the proposals,
- The consultation form seeks suggestions for alternative options – unreasonable for development not to go ahead unless an alternative is identified.

Council response:

The Preferred Options consultation was an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

The Council was aware that the consultation would fall over the school summer holiday period and this was unavoidable due to the tight timeframe for the preparation of the DPD. The consultation period was extended from the usual six weeks so that it ran for seven weeks. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this

stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

Public consultation on the preferred options stage of the DPD involved notifying all those registered on electronic consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case with consulting on major planning applications, letters were sent to properties located within 100m radius of the proposed sites, and a press release was issued with additional media involvement. The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the response to the consultation was extensive with around 4,500 people making around 8,500 comments.

4. Crime

Consultation comments:

- Development would result in an increase in crime.

Council response:

Comment noted. All development will be designed to create safe environments, addressing crime prevention and community safety as required in national and local policy.

5. Cultural heritage and the built environment

Consultation comments:

- Planning departments have a duty of care to ensure that the heritage of beautiful villages, like Pangbourne, is protected.
- The SA/SEA notes that the area has high archaeological potential.

Council response:

One of the core planning principles of the National Planning Policy Framework is the conservation of heritage assets. At a local level, this objective is reflected in Core Strategy policy CS19 (Historic Environment and Landscape Character).

The Council's archaeological officer has advised that there is a Roman cemetery to the north of the site and medieval activity. As such a desk based assessment will be required to accompany any planning application should the site be allocated.

6. Ecology

Consultation comments:

- The proposal is contrary to policy CS18 of the Core Strategy.
- Impact on wildlife, in particular bats, badgers, slow worms, deer, skylarks, red kites. A badger sett is reported in the bank near to the entrance of the site, and a further one within the site itself.
- Impact on wildlife not considered – no list of flora/fauna provided.
- Meadow and woodland habitats should not be destroyed.
- Mitigation will not replace the variety of species found on the site.
- Mature trees on site.
- Thinning and clearance of trees has already taken place either in anticipation of allocation or because the decision has been made.
- Loss of trees to enable the provision of a footpath on Pangbourne Hill and site lines at the site entrance.
- Damage to trees and verges from large vehicles.
- Neutral impact queried against the SA/SEA criteria 'will it conserve and enhance the biodiversity and geodiversity assets across West Berkshire?'. Making the junction of the site with Pangbourne Hill safe would require considerable groundworks and loss of tree cover from the cemetery and adjacent bank, currently home to a badger sett

Site promoter's comments:

Regarding the comparative merits between PAN001 and PAN002; the western part of PAN001 is identified as a BAP priority site. The potential impact of the proposed development upon the BAP is unknown. PAN002 has no ecological designations and has low ecological value. Development would include the creation of new habitats on adjoining land which will be subject to a Landscape Biodiversity Management Plan.

Council response:

Initial screening of the sites by the Council's ecologist has taken place, and sites with significant ecological issues have not been taken forward as preferred options. The Council's ecologist has advised that there are dormice present on the site; however this is not necessarily a showstopper to development as mitigation measures can be implemented (and these can be a condition to any grant of planning permission). Should the site be allocated, an extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected.

None of the trees on the site are subject to Tree Preservation Orders. Thinning and clearance of trees that has already taken place is not a matter for the DPD.

Consideration of the loss of trees in relation to the visual impact upon the landscape is considered below within section 12: landscape/setting.

7. Flood risk

Consultation comments:

- Site adjacent to an area prone to surface water flooding.
- Development and loss of vegetation on the site will result in increased run-off, further strain on drains and subsequent flooding in Pangbourne. This is not mentioned in the SA/SEA.
- Work to culverts along Tidmarsh Road and the cleaning of gullies on Green Lane has not resolved the problem of surface water flooding.
- Flood risk in Pangbourne.
- The Council have not undertaken a Flood Risk Assessment (FRA).
- The Council have not undertaken a Sustainable Drainage System (SuDS) test.
- Flood risk from overwhelmed sewage and drainage system.

Site promoter comments:

As required, a flood risk assessment has been prepared for the forthcoming outline application. The site is suitable for infiltration soakaways and a surface water drainage strategy will be submitted. These documents show that development of PAN002 will not increase flood risk along Pangbourne Hill or elsewhere.

Council response:

The site itself falls within Flood Zone 1 whereby there is a low probability of fluvial flooding. The site is not within an area susceptible to surface water flood risk; however Pangbourne Hill which fronts the site does fall within an area susceptible to surface water flooding. Any planning application submitted would need to be accompanied by a Flood Risk Assessment (FRA) in line with the requirements of Core Strategy policy CS16 (Flooding). This policy also requires the provision of Sustainable Drainage Systems (SuDS) in all new developments. SUDs are designed to control surface water run-off close to where it falls and mimic natural drainage.

Comments regarding flood risk in Pangbourne noted. Sites that have a significant flood risk have not been taken forward.

Comments regarding the work to culverts on Tidmarsh Road and the cleaning of gullies on Green Lane are noted. These issues do not fall within the remit of the Housing Site Allocations DPD.

Consideration of the sewage and drainage system is made in section 11: infrastructure, below.

8. Gaps between settlements

Consultation comments:

- Coalescence of settlements.
- Development will set a precedent and contribute to the risk of sprawl, eg. towards Reading, Newbury, Tidmarsh, Upper Basildon and Pangbourne College.
- There is limited separation between settlements (Pangbourne/Tidmarsh and Pangbourne/Purley) which would be further reduced by development. Gap previously viewed as needing to be preserved.
- Settlement gaps should be retained.

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19 (Historic Environment and Landscape Character) of the Core Strategy.

9. Green belt

Consultation comments:

- Proposal is contrary to section 9 (protecting green belt land) of the NPPF.
- Site an ancient area of green belt.
- Green belt policy ignored.
- Erosion of greenbelt between Reading and Pangbourne, and Tidmarsh and Pangbourne.
- Pressure in green belt stretched to the limit, particularly as Reading is proposed as a garden city.

Council response:

The site is not located within statutory greenbelt. No such designations exist within West Berkshire.

10. Highways and transport

Access

Consultation comments:

- Safe access could not be achieved – no sight lines, no footpaths on Pangbourne Hill, narrow width of Pangbourne Hill, high speed of traffic on Pangbourne Hill, close proximity to dangerous junction (Bere Court Road/Pangbourne Hill).
- Significant groundworks and loss of tree cover/mature vegetation required to enable access and visibility splays. This could harm a badger sett on the adjacent bank.
- Although access achievable, it is not mentioned this is only the case if the access to the SSE sub-station is reformed.
- Advice provided at the exhibition held by the developers (July 2014) highlighted that no problems foreseen with access onto Pangbourne Hill. Appears that existing traffic movements seem to have been ignored.
- Further work required to investigate the impact that an access from Pangbourne Hill would have on the restricted Pangbourne Hill/A340 Tidmarsh Road junction.
- SA/SEA – no mention of the 40m height difference between the site entrance and Pangbourne.
- Boundary of the site should be moved 10-12m to the west of the western boundary of the cemetery. This would enable the strip of land to the west of the cemetery to provide an alternative access to the site and allow for a better access to the cemetery.

Site promoter's comments:

In respect of the comparative merits between PAN001 and PAN002, PAN002 is closer to Pangbourne centre, the train station and nearest bus stop. PAN002 will deliver a new footpath to Pangbourne Hill, improving pedestrian accessibility and provide a publically accessible open space/children's play area, improving access for the community as a whole. It is unlikely safe pedestrian links can be provided to PAN001 and there is no indication that publically accessible recreational facilities will be provided.

Council response:

The Council's Highways and Transport Team have advised that an acceptable access would seem achievable onto Pangbourne Hill. The site promoter is proposing a new footpath along Pangbourne Hill

The Landscape Sensitivity Assessment has recommended that the continuous bank and tree cover along Pangbourne Hill should not be broken to provide access to the site. Further detail on access would be covered at the planning application stage.

The illustrative masterplan for the site from the site promoter (see: <http://consult.westberks.gov.uk/file/3163287/web>) indicates that the existing substation will be retained.

In respect of the Pangbourne Hill/A340 Tidmarsh Road junction, this is covered on the 'highway network/traffic' section below.

It is not proposed to amend the SA/SEA to take account of the height difference given that the Council's Highways and Transport team consider access onto Pangbourne Hill to be achievable.

Comments about the boundary of the site noted. The site boundaries within the DPD are those that have been put forward by site promoters/land owners.

Highway network/traffic

Consultation comments:

- Local road system in vicinity of site inadequate and incapable of supporting additional traffic both during and after construction, eg. narrow roads, lack of footpaths. Improvements, which would include road widening, road surface improvements/repairs, demolition of walls/listed buildings, re-engineering of junctions, may necessitate the compulsory purchase of land.
- Impact on Pangbourne Hill, Tidmarsh Road, Green Lane, Horseshoe Road, Bere Court Road, Courtlands Road, Flowers Hill, Shooters Hill, Church Street, Riverview Road, Station Road, Upper Basildon, Compton, and Yattendon.
- Majority of traffic and trips generated would be down Pangbourne Hill into the narrow junction with the A340. 2008 Council study concluded that the improvement of this junction is not possible. Advice provided at the exhibition held by the developers (July 2014) highlighted that no problems foreseen at the junction of Tidmarsh Road. Appears that existing traffic movements seem to have been ignored.
- SA/SEA notes that the Pangbourne Hill/A340 Tidmarsh Road junction has problems, but does not mention the 2008 Council study which concluded that junction improvements could only be achieved through the loss of listed buildings.
- The Council is undertaking traffic flow surveys to monitor congestion at the Pangbourne Hill/A340 Tidmarsh Road junction. The Council is asked to undertake such surveys over a continued period of time (including periods outside of the school holidays) at representative/realistic times of the day.
- Existing congestion and traffic disruption would be exacerbated by development, particularly at peak times. Do developers have a responsibility to consider increases in traffic?
- Commuting/reliance on car use likely due to the limited capacity at Pangbourne Primary School, the distance of the site from the centre of Pangbourne, limited employment opportunities, and the incline of Pangbourne Hill.
- Allowance not made for 'generated traffic' associated with the development. Traffic movements figure will be 40-50% higher with 600 vehicle movements per day from PAN001 and PAN002. When and how were traffic movements assessed?
- Has consideration been given to traffic generated from other sites?
- SA/SEA does not record that Pangbourne Hill is a medieval lane.

- Courtlands Hill and Green Lane are both unadopted roads and residents pay an annual subscription to cover the cost of maintenance. Additional traffic movements generated by the development would add to the maintenance costs.
- Other similar sized sites within the AONB have been rejected due to highway implications, eg. KIN011 and KIN016.
- Roads in vicinity of site used for rat running, which would increase following development of the site.
- Road safety concerns – poor sight lines at junctions (Pangbourne Hill/A340 Tidmarsh Road, Pangbourne Hill/Green Lane, Pangbourne Hill/Bere Court Road, Pangbourne Hill/Riverview Road), lack of footpaths/narrow footpaths, risk to pedestrians and cyclists from increased traffic movements, issue of speeding along local roads, no pedestrian access to the site.
- Disagreement with the uncertain score within the SA/SEA for the criteria ‘will it reduce the number of road traffic accidents and improve safety?’ It is acknowledged that additional traffic could result in road safety concerns due to width of roads and lack of footpaths, there are limited footpaths, and there would be a significant amount of traffic generated by both PAN001 and PAN002. Without mitigation, the score should be negative.

Site promoter’s comments:

In terms of capacity and safety, the Council commented that the site would have a marginal impact on the network but had concerns over the impact on the Pangbourne Hill/A340 Tidmarsh Rd junction. At a subsequent meeting it was confirmed that it would not have a material impact on the local network, including the junction, and that the site would be expected to deliver improvements to road safety including improvements to the Pangbourne Hill/Bere Court Road junction, a new footpath along Pangbourne Hill, and new bus stops. The planning application will also include a car park for the cemetery.

In respect of the comparative merits between PAN001 and PAN002, PAN001 has significant access and highway issues, taking traffic through existing residential areas. PAN002 access can be secured directly off Pangbourne Hill. A new footpath along Pangbourne Hill, new car park to the cemetery and improvements to Bere Court Road/Pangbourne Hill frontage will improve highway safety.

Site promoter’s comments post preferred options consultation:

The preferred options consultation identified the site as a preferred site, subject to further investigation of the impact on the Pangbourne Hill/A340 Tidmarsh Road junction. The case officer report to a planning application for the site (ref: 14/03135/OUTMAJ) noted that:

‘An assessment of the Pangbourne Hill/A340 Tidmarsh Road junction was submitted with the application. On the basis that the assessment, the Highways Officer has no further concerns with this element of the proposed development and taking all other transport and highways considerations into account, recommended that conditional planning permission is granted.’

Council response:

The Council's Highways and Transport team concluded that the proposal would have a marginal impact upon the highway network. They originally raised concerns regarding the impact on the restricted Pangbourne Hill / A340 Tidmarsh Lane junction whereby most traffic is expected to head to and from. However, the case officer's report on the hybrid planning application for 35 dwellings on the site (ref: 14/03135/OUTMAJ) noted that highway officers requested the developer carry out an assessment of the Pangbourne Hill/A340 Tidmarsh Road junction. This assessment concluded that the increase in traffic at the junction would have little impact at the junction. In light of the assessment, the Council's highways officer has no further concerns with this element of the proposal. Furthermore, the case officer's report states that highway officers have advised that they foresee no substantial reasons on highway grounds that could be used to even consider a recommendation for refusal.

Road surface repairs/improvements are not a planning matter.

A new footpath along Pangbourne Hill is proposed.

Comments about traffic flow surveys noted. This is not a matter for the housing Site Allocations DPD.

The Council's Highways and Transport Team have advised that this site can accommodate up to 35 houses that will generate circa 210 daily vehicle movements including circa 21 during the 08.00 to 09.00 AM peak.

The centre of the site is approximately 0.9km from Pangbourne Railway Station, which is within the Chartered Institute of Highways and Transportation's (CIHT's) "acceptable walking distances" for commuting or travel to school which is set at 2km (CIHT, 2000). The Council's Highways and Transport team has advised that Pangbourne Hill has a limited bi-hourly bus service to places such as Reading. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

Pangbourne Hill has a limited bi-hourly bus service to places such as Reading. All other services serving Pangbourne are up to 600 metres away. New bus stops will be provided.

Traffic movements were established using the Traffic Rate Information System (TRICS), a national database of traffic surveys that includes residential. For residential, 6 movements per day per house with .6 movements per house during the peak travel period.

Site PAN001 is considered unsuitable for development on highways grounds.

The Council has commissioned Transport Assessment (TA) work to assess the impact that development of the shortlisted preferred option sites would have upon the highway network. As a worst case scenario, the development of all of the shortlisted sites has been considered. The TAs indicate that the sites themselves are

unlikely to have a significant impact on the highway network, meaning that there will be limited impact on local congestion.

Comments about Pangbourne Hill being a medieval lane are noted. It is not proposed to update the SA/SEA because the Council's Archaeological Officer has not advised that this is a constraint.

Comments about Courtlands Hill and Green Lane being unadopted roads noted.

The site promoters are proposing a new footpath along Pangbourne Hill.

Parking

Consultation comments:

- Parking would be inadequate.
- Insufficient parking in Pangbourne for residents.
- Limited parking spaces on Pangbourne Hill and at Pangbourne rail station.
- An increase in traffic will bring an increased demand for parking in Pangbourne.
- Will the Council increase car parking in the centre of Pangbourne given the likelihood that residents will rely on cars due to the distance of the site from the centre of Pangbourne?

Council response:

Previous parking policies to restrict the amount of parking provided in new developments have caused a number of issues in terms of overspill on-street parking and conversion of front gardens to parking spaces. As a result, new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

The new parking standards also seek to ensure the delivery of good quality neighbourhoods with the level of parking required linked to the area and its accessibility and to the type of housing to be provided.

Limited parking spaces on Pangbourne Hill noted.

The issue of parking at Pangbourne station is noted. Policy ADPP5 (North Wessex Downs AONB) of the Core Strategy identifies that facilities at Pangbourne railway station will be improved in partnership with First Great Western; including additional parking where possible.

Public transport

Consultation response:

- Infrequent bus service, eg. 2 hourly from Pangbourne Hill to the centre of Pangbourne and Reading, which is dependent upon subsidy from the Council.
- The SA/SEA does not mention that the bi-hourly bus service is heavily dependent upon subsidy from the Council.

Site promoter's comments:

Pangbourne is served by the Oxford to Reading railway line and several buses linking to Newbury and Reading. With the possible exception of Hungerford, we consider this represents the highest level of public transport accessibility amongst all of the settlements in the AONB spatial area. We consider access to the train station and bus stops are within reasonable walking and cycling distances of the site.

Council response:

The Council's Public Transport Officer has advised that from a public transport point of view, this site (which is located adjacent to the Upper Basildon-Pangbourne-Reading bus route and within walking distance of Pangbourne Station) is acceptable. Development could provide an opportunity to enable an enhanced bus service to be put in place, promoted and sustained.

Walking and cycling

Consultation comments:

- The sites location will not give rise to opportunities for walking and cycling – lack of footpaths, narrow width of footpaths and roads. As a result, disagreement with the positive scores within the SA/SEA for the criteria 'to improve health and well being and reduce inequalities' and 'will it increase travel choices, especially for walking, cycling and public transport?'.
• Limited and narrow footpaths on Pangbourne Hill which cannot be widened.
- For any new residential scheme, sustainable transport objectives must be achieved through the provision of easy access for all modes of transport, including walking and cycling.
- Recent so called 'improvements' (pedestrian island at the bottom of Pangbourne Hill, resurfacing of the pavement on Pangbourne Hill) undertaken in preparation for a planning application to show pedestrians being catered for thereby ensuring its subsequent 'rubber stamping' approval.

Council response:

The site promoter is proposing a new footway on Pangbourne Hill.

The centre of the site is approximately 0.9km from Pangbourne Railway Station, which is within the Chartered Institute of Highways and Transportation's (CIHT's) "acceptable walking distances" for commuting or travel to school which is set at 2km

(CIHT, 2000). The Council's Highways and Transport team has advised that Pangbourne Hill has a limited bi-hourly bus service to places such as Reading. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application. In light of this, it is not proposed to amend the SA/SEA scoring.

The highways works mentioned (pedestrian island and resurfacing of the pavement) were not undertaken in preparation of a planning application. Any site that is allocated will need to be subject to a planning application which will be considered against the Development Plan for West Berkshire.

11. Infrastructure

Consultation comments:

- Existing infrastructure at capacity and development would create additional pressure.
- Impact on infrastructure (schools, GP services) not considered.
- Services in Pangbourne well used by neighbouring villages, eg. Upper Basildon, Whitchurch.
- Impact of an increased population on Council services.
- Disagreement with the positive score within the SA/SEA for the criteria 'to safeguard and improve accessibility to services and facilities'. The primary school is located at the opposite end of Pangbourne to the site, economic benefits cannot be assessed until long after the completion of development, and limited local job opportunities will result in reliance on commuting.

Site promoter's comments:

Regarding the comparative merits between PAN001 and PAN002, PAN002, if allocated, will include a publically accessible open space/play area and a new car park to serve the cemetery. No indication that PAN001 will provide any improvements to community infrastructure.

Council response:

The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable

housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

Education:

Consultation comments:

- Pangbourne Primary School is full in Key Stage 1 so no guarantee of places for children of new residents.
- Pressure on primary schools in West Berkshire and Reading has resulted in schools having to accept bulge year groups or expand. This will have a knock on effect on secondary schools.
- Primary school needs to be enlarged.
- Will schools be increased to accommodate a larger population?
- Class sizes and waiting lists will increase in schools.

Site promoter's comments:

The Council's Infrastructure Delivery Plan (2013) states that additional primary school spaces are required to meet the impact of new housing in Pangbourne and that additional places can be provided at existing school sites. This means that expansion of Pangbourne Primary School is on the list of community infrastructure projects which are to be funded through CIL, to which the development will contribute. This is therefore not considered to be a constraint upon the development of the site.

Council response:

Initial consultation with Education indicated that a drainage culvert runs through the primary school site which limits the capacity for the school to expand. The school is currently at capacity in terms of numbers.

Recent consultation does not raise any issues.

Healthcare:

Consultation comments:

- Impact on GP services, health care and adult care.
- GP practice needs to be enlarged to support a larger population – will this take place?
- Waiting times to see GPs, eg. a week, up to 2 weeks, and 5 weeks to see a female GP.

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan.

Utilities

Consultation comments:

- Thames Water concern that the current water supply network would be unable to support demand from PAN002 and/or PAN002, requiring a water supply strategy and yet more infrastructure investment.
- SA/SEA – whilst recorded that Thames Water have reservations about the water supply, the issue of the sewage pipes is not mentioned.
- SA/SEA – states that no water supply issues envisaged, yet within the Site Assessment document it is stated that Thames Water have concerns with both water supply and wastewater capability. It is not picked up that sewage flooding has occurred which development will exacerbate.
- Sewage system could not support additional development without a costly major infrastructure project that would result in severe disruption to Pangbourne for many months. There is no indication that Thames Water is prepared to make the necessary investment to allow upgrades. Sewage flooding has already occurred at the bottom of Pangbourne Hill and Courtlands Hill, and there is the potential for wastewater contamination of the trout rich River Pang and River Thames.
- The Council has not indicated how the problems with the sewage network will be overcome.
- Gas and electricity supplies would need to be increased.
- Poor state of underground gas pipes reported.

Site promoter's comments:

The Council notes that Thames Water has expressed concerns about the capability of the wastewater system and water supply to serve PAN002. Thames Water has since confirmed to us that the local wastewater system does have adequate capacity and no improvements are required to service a development of 35 dwellings at PAN002. It is therefore clear that the concerns expressed by Thames Water in relation to wastewater and water supply are either unfounded or are capable of being addressed.

Site promoter's comments post preferred options consultation:

Site promoter in receipt of a report from Thames Water on the capacity of the local potable water supply ('Potable Water Capacity Flow and Pressure Investigation', September 2014) to serve 35 dwellings at PAN002. The report concludes that the network has sufficient spare capacity in the distribution mains network to supply the domestic peak demand profile for the development of up to 35 dwellings, without the requirement of offsite mains reinforcement. However, should the proposal change, the report would become invalid.

Council response:

Consultation has taken place with Thames Water and they have not indicated any water supply problems.

A Duty to Cooperate meeting was held with Thames Water on 12 May 2015 and Thames Water explained the background to their comments made during their preferred options consultation. Thames Water advised that under the Water Industry Act developers have an automatic right to connect to the sewer; this can be addressed at the planning policy stage by asking for a drainage strategy and then later by asking for conditions at the planning application stage.

It was agreed that the way forward would be that the policy to guide the development of any allocated site will ask that an integrated strategy for water and wastewater is prepared to support a planning application and that this should cover flood risk, water quality and conservation. The strategy would need to be clear how a solution would be delivered to any concerns identified as the development came forward. This could then be applied to all sites, regardless of whether concerns have been raised by Thames Water to date.

More recent evidence submitted by the site promoter (a report on the capacity of the local potable water supply by Thames Water) has advised that the network could accommodate up to 35 dwellings.

12. Landscape/setting

AONB:

Consultation comments:

- Development would be contrary to the National Planning Policy Framework (NPPF), eg. paragraphs 115, 116, and 123.
- Development would be contrary to Core Strategy policies ADPP5 and CS19.
- Development would have a detrimental impact upon the AONB and devalue their concept. The site contributes highly to the characteristics of the AONB. Loss of vegetation and trees on the site has already impacted upon the appearance of the hill in the AONB.
- Setting of precedent for further development within the AONB.
- The NPPF basic presumption in favour of development is modified in the AONB – the impact on the landscape is the dominant consideration for all proposed development.
- Council has duty of care to protect the AONB.
- Previous applications for housing developments which smaller than PAN002 within the AONB refused.
- Any form of mitigation incompatible with the Core Strategy's emphasis on protecting the natural beauty of the landscape.
- Mitigation measures will not make the scale of development acceptable.
- Mitigation measures identified in the LSA could not be achieved, eg. recommended that the continuous bank and tree cover should not be broken to

provide access to the site, however the development proposes two footway entrances and a footpath along Pangbourne Hill. This should be reflected in the SA/SEA.

- If the site is selected as the preferred option, Natural England has advised that a LVIA is required to ensure that the AONB is protected as much as possible.
- North Wessex Downs AONB landscape work undertaken at the time of the Core Strategy hearings considered PAN002 to be unacceptable in terms of landscape impact and harm to the character and qualities of the AONB.
- Inaccuracies and inconsistencies reported with the 2011 Landscape Sensitivity Assessment (LSA) make the conclusion flawed. A new study should be carried out.
- Errors reported within the LSA:
 - Summary of compliance with PPS7 paragraph 21 (p.66):
 - Disagreement that there would be little harm to the AONB. This statement contradicts the 'summary of characteristics' (p.64) which advises of the importance of protecting the character of rural lanes, gateways to Pangbourne and the sense of tranquillity.
 - Photographs (p.68):
 - Photographs do not reflect the massive impact that developing the site will have on the village boundary and houses on the western side of Riverview Road.
 - Impact on key landscape characteristics (p.69):
 - Disagreement that there will be no impact on woodland pasture or particular landscape features. Development will result in the removal of a large number of trees/bushes to ensure a safe access to the site. The site is in agricultural use and a clear tract of Green Belt would be deformed by development.
 - Disagreement about tranquillity. The railway line was dug into the hillside to minimise noise pollution and line of sight. The tranquillity of the western side of Riverview Road and Pangbourne Hill would be impacted by developing this land, something the railway line does not do.
 - Impact on key visual characteristics (p.69):
 - No account is made of the views to the east. The topography drops away towards the east and the site becomes prominent on a hill top overlooking the village, with both of the hills on the Mapledurham Estate and adjacent houses in Riverview Road in view. Looking to the south from the plot level of the land is at roof height across Pangbourne Hill.
 - Disagreement that views from the river corridor will not be affected. The settlement character referenced in the West Berkshire District Local Plan and the Pangbourne Village Plan describes Riverview Road as semi rural, Development will destroy this.
 - Impact on key settlement characteristics (p.69):
 - Disagreement that development would extend the village along the Thames valley in keeping with the local settlement character.
 - Recommendations (p.70):
 - Noted that the continuous bank and tree cover along Pangbourne Hill should not be broken to provide access to the site – the development proposes two footway entrances to the site and a

footpath up Pangbourne Hill to the site entrance. It would be impossible for this to be achieved without the loss of the tree-lined bank on the north side of Pangbourne Hill.

Site promoter's comments:

We fully accept that the higher and more exposed parts of the larger site above 75m AOD are visually exposed and should not be developed. Our Landscape and Visual Impact Assessment shows that the plan for PAN002 does not identify the most suitable area for development. We believe development should relate as closely as possible to the existing settlement pattern and should not extend as far north as shown, and be extended west to include the main access to the site. Should PAN002 be allocated, we would suggest that the allocation is based upon the area of development shown on our illustrative masterplan (appendix 6) and that the settlement boundary is adjusted in accordance with appendix 7. Based on the Council's assessment and our assessment, a comprehensive landscape strategy has been devised. All land required for this strategy is owned by our client or the local Highway Authority. Overall, development of PAN002 will have a positive effect on conserving and enhancing the local landscape and the biodiversity assets.

Site promoter's comments post preferred options consultation:

A recent outline planning application for 35 dwellings on the site (ref: 14/03125/OUTMAJ) was refused for two reasons, neither of which related to the suitability of the site or the sustainability of the proposed development. The application was the subject of extensive consultation with all relevant organisations and was the subject of a comprehensive case officer's report which confirmed that there are no technical objections to the development of the site.

We note that the Housing Site Allocations DPD preferred options consultation identified the site as a preferred site, subject to mitigation and enhancement measures to ensure that development is acceptable in landscape terms.

The case officer report on application 14/03135/OUTMAJ noted that:

'The landscape consultant appointed by the Council to advise on the application confirmed that the proposed development complies with the recommended mitigation and enhancement measures set out in the LSA.'

The case officer concluded that the proposed development adequately responds to the recommendations in the LSA and on this basis, the application cannot be refused for its landscape and visual impact.

Council response:

Protection of the AONB is paramount, and where a site was considered to cause harm to the AONB it was not included within the Housing Site Allocations Development Plan Document Preferred Options. The Core Strategy DPD sets out the housing requirement of up to 2000 new homes in the AONB over the plan period, but makes it clear that the provision of this scale of housing is subject to the

overarching objective for the AONB to conserve and enhance its special landscape qualities.

The comment made about the NPPFs presumption in favour of development being modified for areas designated as AONBs is noted.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the AONB would be able to take the amount of development proposed.

The 2011 Landscape Sensitivity Assessment (LSA) considered the impact of development on key visual characteristics. The assessment has indicated that part of the site would be suitable for development subject to certain mitigation measures to reduce the potential impact on the AONB.

All sites that are allocated for development will be supported by a policy which will set out certain requirements that any future planning application will have to adhere to. Such requirements will include any recommendations made in the LSA. The LSA recommends for PAN002 that the continuous bank and tree cover along Pangbourne Hill/Road should not be broken to provide access to the site.

The Council's landscape consultant has responded to the comments from the North Wessex Downs AONB that the site is unacceptable in landscape terms, These are outlined below.

Section	Comment	Response
Assessment of Settlement and Key Landscape, Visual and Settlement Characteristics	There is no assessment of the Landscape Sensitivity of the AONB land surrounding the settlement.	The overall landscape sensitivity of the AONB is taken as high. The characteristics of the landscape around the settlements is described within the text and extracts from the North Wessex Downs AONB Landscape Character Assessment 2002 and other documents
PAN002:		
Relationship with adjacent settlement	Add: The railway embankment to the north and the mature gardens to properties on Riverview Road provide a strong vegetated edge to the settlement.	It is agreed that the following bullet point should also be taken into consideration as part of the site's relationship with the adjacent settlement: <ul style="list-style-type: none"> • The railway embankment to the north and the mature gardens to properties on Riverview

Section	Comment	Response
		Road provide a strong vegetated edge to the settlement.
Relationship with wider countryside	Add: This site is very difficult to access and view as it is enclosed and there are no public rights of way. An assessment of the relationship with the wider countryside is difficult to carry out without access. The site is open downland and from aerial photographs there appears a strong relationship with the wider countryside which flows down to the river valley from Northridge.	The open character of the site is already covered in the report Although access is difficult there are views from access points off Pangbourne Hill, the road network within Whitchurch and the Chilterns Hills and land next to the railway line (although this is now fenced off) which were sufficient to assess the general landscape and visual sensitivity of the site.
Impact on key landscape characteristics	Add: The land appears to be predominantly under pasture not arable (see Photograph PAN 002) Development would impact on a small area of secondary, ash/sycamore woodland in the north east part of the site.	Crops seem to vary from year to year with a grass ley in some years. It is agreed that this was the case in 2011. It is also agreed that there could be a potential impact on a small area of woodland in the north-east corner which should be taken into consideration as part of the impact on key landscape characteristics.
Impact on key visual characteristics	Agree with observations in Kirkham/Terra Firma report.	Noted
Impact on key settlement characteristics	This is a substantial site. Development would extend to a solid unbroken edge to the west. The existing settlement has a relatively varied edge with development gradually filtering out to be replaced by countryside along Pangbourne Hill and Bere Court Road. Development of the whole site would create a solid block, which would be out of keeping with the settlement	It is considered that the current recommendations would ensure that a solid and hard edge to the settlement could be avoided.

Section	Comment	Response
	characteristics.	
Summary of compliance with PPS 7 paragraph 21	Development would result in the loss of an area of open downland and would not conserve or enhance the natural beauty of the AONB. As highlighted above due to the lack of access it is difficult to draw conclusions as to the potential impact of development. The site does, however, benefit from a relatively high degree of visual enclosure for such a large site on open downland.	It is agreed that the site does to some extent benefit from a high degree of visual enclosure but this does not apply to the whole site and for this reason the potential development area was limited to the lower ground below the 75m AOD contour. Conclusions could be drawn from observations on site and using aerial photographs. The 2011 Study sought to analyse individual sites to identify those which might have potential for development without causing significant harm to the natural beauty and special qualities of the AONB.
Recommendations	The whole of the site is considered inappropriate for development and should not be pursued as a SHLAA Site.	It is considered that PAN002 does have the potential for development subject to the constraints set out in the 2011 report.
Conclusions and observations on cumulative impacts of PAN001 and PAN002	Agree on potential number of dwellings at PAN001.	Noted
	PAN002 should not be included as a potential SHLAA site due to access difficulties and scale of development recommended in the 2011 study.	It is considered that PAN002 does have the potential for development subject to the constraints set out in the 2011 report. Any final numbers will depend on detailed landscape and visual assessments of the site.

In addition, the consultant has responded to the concerns expressed that the LSA was inconsistent and contained inaccuracies.

Comment	Response
No account is made of the views to the east. The topography drops away towards the east and the site becomes prominent on a hill top overlooking the village, with both of the hills on the Mapledurham Estate and adjacent houses in Riverview Road in view. Looking to the south from the plot level	The assessment takes account of the impact on views from the west (looking north and east), from the Chilterns AONB and in the approach to Pangbourne.

<p>of the land is at roof height across Pangbourne Hill.</p>	
<p>Photographs do not reflect the massive impact that developing the site will have on the village boundary and houses on the western side of Riverview Road.</p>	<p>The assessment was undertaken from public viewpoints and focuses on landscape impacts and the impact on these public viewpoints. It is agreed that development may have an impact on private views from the existing properties and would extend the settlement slightly to the west on lower ground, in keeping with the settlement pattern.</p>
<p>The statement in the 'key landscape characteristics' section that 'there will be no impact on woodland pasture or particular landscape features is untrue. Development of the land will result in the removal of a large number of trees/bushes to ensure a safe access to the site. The site is in agricultural use and a clear tract of Green Belt that would be deformed by development. The fifth point contradicts this statement – 'access would require partial removal of local tree cover'.</p>	<p>The impact on the tree belt along Pangbourne Hill is considered in the assessment and covered in the recommendations.</p>
<p>The statement in the 'key landscape characteristics' section that 'tranquillity of the northern part of the site is already compromised by the railway line'. The railway line was dug into the hillside to minimise noise pollution and line of sight. The tranquillity of the western side of Riverview Road and Pangbourne Hill would be impacted by developing this land, something the railway line does not do.</p>	<p>It is agreed that there would be some impact on the setting of the properties on the western side of Riverview Road. Pangbourne Hill is affected by traffic and existing development.</p>
<p>The views from the river corridor <i>will</i> be affected.</p>	<p>The river corridor was visited during the assessment and views to the site are largely screened by intervening vegetation, built form and the landform. A detailed landscape and visual impact assessment would be needed to ensure that any development did not harm the views from the river corridor.</p>
<p>The recommendation not to break the continuous bank and tree cover along Pangbourne Hill to provide access will not be achieved. Access to the site will have to break the tree cover, not just for the length of the access road, but a</p>	<p>The assessment considered that it would be possible to take advantage of the existing access and avoid breaking the continuity of the tree belt to the east. It is agreed that a detailed assessment would be needed to accommodate sight lines.</p>

great deal more either side to ensure safe sight when manoeuvring from the new road out onto Pangbourne Hill.	
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The suggested amendment to the site layout boundary is noted. As per the recommendations of the LSA, the layout should be restricted to the lower slopes of the site below the 75, AOD contour, or 70m AOD where the site is more visually exposed.

Setting and character:

Consultation comments:

- Development would be contrary to policy CS14 of the Core Strategy and the Pangbourne Village Plan.
- The proposed density, reduced plot sizes and number of dwellings would not be in keeping with the existing character and pattern of development in Pangbourne, ie. detached dwellings in large plots, and it would undermine the soft transition into the open countryside.
- Loss of trees and hedgerow will harm the character of Pangbourne Hill.
- Developing beyond the settlement boundary will not preserve the character of Pangbourne.
- The SA/SEA acknowledges that development would impact upon the western side of Pangbourne – this alone should rule out development of the site.
- Conservation and enhancement of the landscape has not been the paramount consideration in the selection of the site.
- Expectation of privacy due to the semi rural character and low density of the area in accordance with the Quality Design Supplementary Planning Document.
- The Village Design Statement states that Riverview Road relies on the landscape rather than the houses for its character, and this is reiterated in the Quality Design SPD.
- Proportion of affordable housing required would conflict with the character of the area.
- Cemetery borders PAN002 – the site should be maintained as an open, quiet area in keeping with its surroundings.
- Natural England has advised that if selected as the preferred option, evidence and criteria based evidence should be provided for its selection.
- Support for the proposal due to the limited effect it would have on the appearance of the village and its extent.

Council response:

One of the recommendations of the Landscape Sensitivity Assessment (LSA) is that development should be in keeping with the mass, scale and density of the western part of Pangbourne. Should the site be allocated, this requirement will be included in a specific policy for the site.

The LSA requires the retention of the continuous bank and tree cover along Pangbourne Hill which should not be broken to provide access to the site. As

aforementioned, the site promoter has drawn attention to the case officer's report on the hybrid planning application for the site (ref: 14/03135/OUTMAJ) which commented that the proposed development complies with the mitigation and enhancement measures set out in the LSA. Landscape Sensitivity Assessment (2011).

The LSA notes that development would extend the village along the Thames Valley in keeping with the local settlement character. Furthermore, one of the recommendations of the LSA is for planting along the western boundary of the site with linear woodland designed to reflect the local topography and vegetation pattern and contain the settlement.

The LSA advises that development on the whole site would result in significant harm to the natural beauty of the AONB and advises that only part of the site is suitable for development subject to a series of mitigation measures.

Protection of the AONB is paramount, and where a site was considered to cause harm to the AONB it was not included within the Housing Site Allocations Development Plan Document Preferred Options. The Core Strategy DPD sets out the housing requirement of up to 2000 new homes in the AONB over the plan period, but makes it clear that the provision of this scale of housing is subject to the overarching objective for the AONB to conserve and enhance its special landscape qualities.

All sites within or adjacent to the AONB have had a Landscape Capacity Assessment carried out.

The LSA advised that uniform development over the whole site would not be in keeping with the built form in the village. One of the mitigation measures recommended in the LSA is that development should be in keeping with the mass, scale and density of the western part of Pangbourne. Therefore, should the site be allocated, this requirement will be included in a specific policy for the site.

Supplementary Planning Documents (SPDs), such as the Quality Design SPD, are material considerations in the planning process. Any site that is allocated will still have to be subject to a planning application.

It is not uncommon for cemeteries to be located in residential areas. The indicative site layout does not propose any housing adjacent to the cemetery. The impact on neighbouring amenity is a consideration at the planning application stage, not site allocations.

A Duty to Cooperate meeting was held between the Council and Natural England in April 2015. At the meeting, Natural England made clear that it now wanted to refocus the original comments made to the preferred options consultation and it would use this meeting to do that. In going forward, the Council should use the comments made in Duty to Cooperate meeting to represent the views of Natural England rather than the original comments.

The spatial distribution was agreed in the Core Strategy and the Housing Site Allocations DPD is being taken forward in accordance with Core Strategy policy ADPP5 which makes clear how development will be accommodated across the AONB. Landscape Sensitivity Assessment work has been undertaken.

The site selection process is set out within Appendix B of the Housing Site Allocations DPD background paper (see: <http://info.westberks.gov.uk/CHttpHandler.ashx?id=38034&p=0>) and the SA/SEA Environmental Report (see: <http://info.westberks.gov.uk/index.aspx?articleid=30373>).

Support for the proposal due to the limited effect it would have on the appearance of the village and its extent noted.

Views:

Consultation comments:

- Development will impact upon views of the Thames Valley, Chilterns, and the approach/gateway to Pangbourne.
- Harm to rural lanes and gateways.
- The site is prominent and can be viewed from South Oxfordshire, the Thames, Goring Gap and towards Mapledurham. The impact of development when viewed from Oxfordshire has not been taken into account.
- Development would result in the loss of views of open farmland from rear gardens of Riverview Road. The photos used by the Visual Impact Statement are misleading – they convey minimal overlooking of the houses in Riverview Road due to being taken from the southern boundary of the proposed development.

Council response:

The LSA recognises that development, particularly on the higher slopes would be prominent in views from the west and the Chilterns AONB, and the approach to Pangbourne, thereby affecting this gateway. However, the LSA goes on to state that development on the lower northern slopes would be less intrusive. To this end, the LSA recommends that development should be in keeping with the mass, scale and density of the western part of Pangbourne. Should the site be allocated, this requirement will be included in a specific policy for the site.

The Chilterns AONB falls within Oxfordshire and covers the area of Oxfordshire that abounds West Berkshire, including Mapledurham and the Goring Gap.

It is established in the planning system that the loss of private views does not constitute a material planning consideration.

The referenced Visual Impact Statement was not submitted with the response to the preferred options consultation from the site promoter. One of the supporting documents to the hybrid planning application for the site included a Landscape and Visual Impact Assessment.

13. Open space

Consultation comments:

- Development will place pressure on existing open spaces.

Site promoter's comments:

Publically accessible open spaces are on the other side of the settlement. The planning application for PAN002 will provide a new public open space and children's play area on adjoining land.

Council response:

Should the site be allocated and a planning application subsequently submitted, development on the site would need to meet the requirements of the Green Infrastructure policy (CS18) of the Core Strategy and saved policy RL.1. Details of open space provision, ie. location, would be subject to more detailed work at the planning application stage.

The site promoter has indicated that public open space and a children's play area will be provided on adjoining land to the site.

14. Personal

Consultation comments:

- If the development of both PAN001 and PAN002 took place at the same time, the impact on the quality of life in Pangbourne would be prolonged and severe.
- Development will result in disruption and harm to local residents.
- Construction period will give rise to disruption (eg. noise and vibration). This could last for several years.
- Loss of privacy and overlooking due to the ridge lines being a similar height to the power line mast.
- Residents moved to Pangbourne to enjoy the rural and quiet nature of the village. The proposals have not had regard to this.

Council response:

It is acknowledged that construction works can result in temporary disturbance. There are concerns about the suitability of site PAN001, and it is therefore not proposed to allocate this site.

A certain amount of noise is to be expected in most types of construction and cannot be completely prevented. The Council can serve a notice imposing requirements as to how construction works should be carried out to minimise noise and disturbance. The notice can cover working hours and noise limits.

National Planning Policy Guidance requires that planning policies and decisions do not undermine quality of life. Policy CS14 (Design Principles) of the Core Strategy

requires that all new development must make a positive contribution to the quality of life in West Berkshire. All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on social, environmental, and economic factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

It is established in the planning system that the loss of private views does not constitute a material planning consideration.

15. Planning policy

Consultation comments:

- What is the West Berkshire overall plan and how does it impact with the statements in the Pangbourne Village Plan?

Council response:

The Development Plan for West Berkshire sets out local planning policies, and comprises of the Core Strategy DPD, the West Berkshire Local Plan 1991-2006 (Saved Policies 2007), the Replacement Minerals and Waste Local Plan for Berkshire, and the Waste Local Plan for Berkshire. When the Housing Site Allocations DPD is adopted (this is anticipated for December 2016), it will form part of the development plan.

Village plans are used to inform and support the policies of the development plan, and are a material consideration in the determination of planning applications.

Any site that is allocated within the Housing Site Allocations DPD will need to be subject to a planning application which will be assessed against the Development Plan for West Berkshire, in addition to national planning policy.

16. Pollution

Consultation comments:

- The development will create more pollution.
- Increase in noise pollution from increased traffic levels, eg. on Pangbourne Hill.
- The suggested footpath and retaining wall alongside Pangbourne Hill will reflect noise towards houses on the adjacent side of Pangbourne Hill.
- Slopes of Green Lane, Courtlands Road and Flowers Hill would require lorries to travel up in low gear thereby creating noise and pollution.
- The hedge row and trees on Pangbourne Hill, which will be removed to enable development, currently serve to reduce traffic noise and the effects of air pollution.
- Existing congestion at the bottom of Pangbourne Hill creates noise and air pollution.
- Development will result in light pollution.

- Land drops from the east side of the site away onto Riverview Road and Pangbourne village. Development will ruin the dark skies at night in this part of Pangbourne.
- SA/SEA 'will it reduce omissions contributing to climate change and ensure adaptation measures are in place to respond to climate change?': Claim that mitigation measures could lead to a neutral impact has resulted in unspecified traffic plans to reduce car traffic. If such plans include restrictions on motor vehicle access to Bere Court Road and Green Lane, then this would be unenforceable and ineffective. Other roads would become rat runs.

Council response:

It is unlikely that development of the site will have a significant impact on noise or air quality pollution. However should the site be allocated and a planning application subsequently submitted, then proposals will need to comply with Saved Local Plan policies OVS.5 (Environmental Nuisance and Pollution Control) and OVS.6 (Noise Pollution).

All development proposals will be expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 (Sustainable Construction and Energy Efficiency) of the Core Strategy DPD.

The issue of lorries travelling in low gear along Green Lane, Courtlands Road and Flowers Hill is not a matter for consideration within this DPD.

The Landscape Sensitivity Assessment (LSA) advises that the continuous tree cover on Pangbourne Hill should not be broken to provide access to the site. The LSA further advises that the western boundary should be planted with woodland.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution.

The comment in the SA/SEA about Travel Plans was provided as an example to illustrate how contributions to greenhouse gas emissions could be reduced. A Travel Plan will also be required to accompany a planning application. This sets out ways the development will promote and encourage the use of alternative modes of travel for everyday journeys.

17. Principle of development

Consultation comments:

- Development would be contrary to national and local planning policies – paragraph 17 of the National Planning Policy Framework (NPPF), policy ADPP5 of the Core Strategy, the Pangbourne Village Plan, and the Pangbourne Village Plan.
- Approach unsound – sites within the AONB should not be automatically identified through the DPD process. Sites within the AONB should only be considered when all other land has been considered. Rural service centre designation does

not guarantee there is capacity for future large scale development and geographical constraints in Pangbourne preclude against development so the approach of the Local Plan should be to consider other areas of the AONB.

- Recognition of need for housing, but sites selected are unsuitable.
- Proposed development on the site is not currently assessed as being developable or deliverable.
- PAN002 preferable to PAN001.
- A larger plot will allow for better planning options.
- Significant development has already taken place in Pangbourne. PAN001 and PAN002 will have a significant cumulative impact.
- Allocation of the site not required – 1000 dwellings found during the period 2006-2014 without the need for large scale development. Another 1000 could be accommodated between 2014 and 2016 without the need for large sites.
- The Council has until 2026 to deliver the housing requirement. There should therefore be no rush to accept sites initially promoted unless they are a good proposition for the community.
- Development would set a precedent.
- Development could have a negative impact upon sustainability in relation to land use efficiency.
- Change of use of designated agricultural land outside the village boundary and within the AONB would not be possible for at least 10 years.
- Proposed contribution of housing in Pangbourne equates to over 3% of the population, the highest of all the small settlements. The Eastern Area contributes to 30% of the total required. The EUA contributes to a very high proportion of the total required. The call on this sensitive area is out of step with the rest of West Berkshire.
- Disproportionate amount of development proposed for the east of the district compared to other areas, eg. Thatcham.
- If deliverability of PAN001 and PAN002 is compromised, then Pangbourne's status as a rural service centre, where some growth is expected, would oblige the Council to have to issue another call for sites in or outside of the settlement boundary from local developers.
- Whilst there is a greater cost to developers of developing former industrial sites, the cost to local residents is irrevocable and permanent as fields are lost and settlements coalesce.
- Pangbourne Parish Council's comments in the SA/SEA claim that they might be in favour of smaller developments on PAN001 and PAN002. This was an informal remark to the effect that *if* it was ultimately decided to proceed with one or both of these developments, the Council would prefer smaller numbers than those envisaged in the current proposals. Until the final decisions as to which site's go forward, Pangbourne Parish Council does not wish to speculate on what its reaction might be.

Site promoter's comments:

It is evident that the Council is unable to demonstrate a 5 year supply of deliverable housing sites. The Council should abandon its attempt to propose a Housing Site Allocation DPD based on the out of date housing requirement set out in the adopted Core Strategy and should commence work on a partial review of the local plan

(including housing site allocations) based upon an up to date Strategic Housing Market Assessment of the full objectively assessed housing needs of the area.

No assessment of the effects of sites on the overall distribution of new housing within the AONB spatial area has been undertaken and this is a serious flaw.

We have undertaken an assessment of new housing distribution in the AONB spatial area over the plan period 2006-2026 against the spatial strategy and policies of the Core Strategy and relevant national policies.

Of the 2,000 dwellings to be delivered 2006-2026, a total of 1,740 dwellings (87%) are already accounted for at June 2014 and that the distribution of these dwellings across the AONB settlement hierarchy is 24.8% to Rural Service Centres, 36.8% to Service Villages and 38.4% to other villages at the bottom of the settlement hierarchy and the open countryside. The Council has failed to deliver a distribution of housing in the AONB spatial area which is both sustainable and in accordance with its own settlement hierarchy/spatial strategy.

It is essential that the Housing Site Allocations DPD should allocate the vast proportion, if not all, of the outstanding housing requirement to locations within or adjacent to the most sustainable settlements within the AONB spatial area, the rural service centres.

Even if all of the outstanding requirement (260 dwellings) is allocated to the Rural Service Centres, the damage has already been done and the resulting distribution of housing will still be weighted disproportionately towards less sustainable and unsustainable locations.

In the West Berkshire Settlement Hierarchy Topic Paper (2012), it is clear that the Council intended Rural Service Centres to be the locations for about twice the number of new dwellings as the Service Villages. We are greatly concerned that the Preferred Options includes proposed allocations for all 6 Service Villages in the AONB, which will only perpetuate the dispersed and unsustainable pattern of development which has and will continue to take place throughout the plan period.

Most new housing development should be focused on the Rural Service Centres in the AONB. It is clear from the Council's figures that new housing development is highly dispersed throughout the area and is not being delivered in accordance with the Core Strategy and NPPF. It is essential that most, if not all, of the outstanding housing requirement is allocated to sites adjoining the Rural Service Centres.

The Council's housing figures identify that new housing development will be dispersed throughout the AONB, with over 75% going to the lowest tier in the settlement hierarchy (Service Villages) or locations below the settlement hierarchy altogether. This is wholly inconsistent with the adopted spatial strategy which is intended to deliver new housing in locations higher up the settlement hierarchy such as Pangbourne. Analysis shows that at June 2014, at best only 91 dwellings are/will be located at Pangbourne. This also means that of the three Rural Service Villages in the AONB, Pangbourne will have just 20% of the dwellings completed/committed,

with the remaining 80% being delivered at Hungerford or Lambourn, both of which serve the western part of the AONB.

According to a Freedom of Information request, no affordable housing units have been completed in Pangbourne in the plan period up to 31 March 2013, this should be considered against the scale of housing need in the east of the District and Pangbourne in particular.

Pangbourne should be the focus for additional housing in accordance with its role and function as a Rural Service Centre, serving the eastern part of the spatial area. The Council's figures confirm that unless additional housing is allocated to Pangbourne in the Housing Site Allocations DPD, there will be significant under delivery of both market and affordable housing relative to its role and standing in the settlement hierarchy. To be considered sound, the DPD must include the allocation of land at Pangbourne.

We support the identification of PAN002 as a preferred housing site. Whilst we have raised objection to the identification of preferred housing sites solely or primarily on the basis of suitability, we fully support a criteria based approach used by the Council to assess site suitability and its decision to select PAN002. Our comments on the overall distribution of development in the AONB provide further justification for allocating PAN002.

Availability – a comprehensive search has confirmed that there are no legal or ownership constraints. The site is available for development.

Suitability – the site is suitable for development and there are no physical or other constraints or problems which cannot be realistically overcome.

Most, if not all, of the outstanding dwelling requirement for the AONB spatial area to be directed to the Rural Service Centres, including the allocation of land at Pangbourne.

PAN002 should be allocated for 35 dwellings with the site area amended in accordance with appendix 7 (see: <http://consult.westberks.gov.uk/file/3163286/web>) of the representation to the preferred options consultation. The Pangbourne settlement boundary to be amended accordingly.

Site promoter's comments post preferred options consultation:

A planning application for a hybrid application (outline application for 35 dwellings and combined public amenity space with all matters reserved, and full application for the principle means of pedestrian and vehicular access off Pangbourne Hill, a new footway, engineering and landscaping works along the Pangbourne Hill frontage, and car park to serve Pangbourne cemetery) was refused for two reasons, neither of which related to the suitability of the site or the sustainability of the proposed development. The application was subject to extensive consultation with all relevant organisations and was the subject of a comprehensive case officer's report which confirmed that there were no technical objections to the development of the site.

The only outstanding technical concerns raised by the preferred options for consultation version of the DPD have been overcome. Furthermore, the case officer's report addresses all of the objections to the proposed development raised by third parties and concludes that none of these objections can be sustained on planning grounds.

We therefore conclude that there are no outstanding planning or technical objections to the development of the PAN002 site for 35 dwellings to prevent its allocation.

Council response:

The site has been submitted to the Council for inclusion within the Strategic Housing Land Availability Assessment (SHLAA), and therefore, it is acceptable to consider the site for development.

The Council's Core Strategy sets out the housing requirement for the district over the period 2006 – 2026, the spatial distribution for development (including within the AONB) and allocates strategic development sites. The role of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic housing sites across the district.

The Core Strategy was examined at a time of transition in the planning system. This led 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. The Council originally proposed to progress a Site Allocations and Delivery DPD, however the approach was 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 housing need and look to the longer term. In coming to his decision, the Inspector had specific regard to the Core Planning Principles of the NPPF, one of which notes that planning should be genuinely plan-led and positive process to support sustainable economic development.

Discussions held with the Planning Inspectorate suggested that there was a case for pragmatism in terms of fast tracking the allocation of housing sites through a Housing Site Allocations DPD. A SHMA is currently being progressed, and is in the process of being finalised.

The Housing Site Allocations DPD will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

- Effective – deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

It is through this process that the views of members of the public, developers and agents are considered. However, the Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and with Duty to Cooperate, legal and procedural requirements have been met.

The Core Strategy makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary, therefore the HSA DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

The SA/SEA has been updated to include the revised comments from Pangbourne Parish Council.

Settlement boundaries will be redrawn around any sites that are allocated to protect those areas outside of the new boundary from development.

The spatial distribution of development has been considered as part of the site assessment process – the first part of this process assessed sites against 'automatic exclusion' criteria. These criteria included whether a site's size would be out of keeping with a settlements size and function within the settlement hierarchy. In some areas, more sites have been shortlisted than are required, meaning choices have to be made regarding which site or sites will finally be allocated. It should also be noted that a influencing the shortlisting of sites within the AONB is the impact that development will have upon the landscape. To this end, all sites within or adjacent to the AONB have been subject to a Landscape Capacity Assessment.

Comments about the lack of delivery of affordable housing units in Pangbourne and that this should be considered against the scale of housing need in the east of the district and Pangbourne are noted. The criteria used to assess all sites have their basis in national and local policy, focusing on the three elements of sustainability (economic, environmental and social). To consider the selection of sites only in terms how they would contribute to the scale of housing need would be unsustainable.

Alternative sites:

Consultation comments:

- Insufficient effort made to identify alternative areas for development.
- Sites of less than 10 dwellings and the redevelopment of existing houses and gardens have not been considered.
- Priority of using brownfield sites not being fully exploited. Brownfield sites available, eg. within Pangbourne and Theale.
- There is obligation on the Council to fully consider the likelihood of extra homes created from windfall sites, infilling, re-use of empty homes and conversion of non-residential/commercial buildings.
- Other sites in appropriate locations, eg. Theale, A4 towards Thatcham, larger conurbations such as Newbury, adjacent to the motorway, less visible, adjacent to existing residential areas.
- Some existing sites have been redeveloped inefficiently, eg. Alms Bungalows on Reading Road could have provided 16 flats.

Council response:

Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

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 new homes". In other spatial areas the windfall allowance is that included in the five year housing land supply.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing. Work on a new Local Plan, which is due to commence following the adoption of the HSA DPD, will include a review of employment land.

Housing need and housing numbers:

Consultation comments:

- What evidence is there to suggest that there is a strong demand for more houses in Pangbourne?
- Local needs have been met by significant housing development in Pangbourne over the last few years by way of infilling and change of use of commercial sites to residential. Such opportunities exist for those skilled in exploiting them and this negates the need for developing on undeveloped land.

- Decisions on the number of dwellings needed should be made at the end of the plan period, ie. in 2026, with any shortfall then addressed. Homes can be built very quickly.
- Geographical constraints and a lack of infill development sites in Pangbourne have resulted in a shortage in supply of suitable sites for housing. The two preferred options are required to meet needs.
- Pangbourne has already contributed to the housing allocation in the last 5 years, eg. 100 dwellings built and two sites under construction.
- While recent projections (2010) from the DCLG indicate that a revised target of 16,000 houses may be needed, the existing requirement for 10,500 is still driving policy.

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination in Public by an Independent Inspector who agreed that based on the evidence provided the AONB would be able to take the amount of development proposed.

The Core Strategy was adopted following the publication of the National Planning Policy Framework (NPPF) and the revocation of the South East Plan, therefore, the housing number in the Core Strategy stands and is considered appropriate.

The Council is now required by national policy set out in the NPPF to meet the 'objectively assessed needs' of the area. Work is underway in partnership with other local authorities to establish how much housing West Berkshire will need in the future through the production of a Strategic Housing Market Assessment (SHMA).

The first part of the future housing requirement is being met through the preparation of the Housing Site Allocations DPD which will allocate the remainder of the 'at least' 10,500 housing figure from the Core Strategy, with some additional flexibility around these numbers.

Once the DPD has been adopted, the remainder of the future housing requirement will be met through the preparation of a new Local Plan which will allocate additional development and look longer term to 2036, as well as dealing with other policy issues.

Identification of sites:

Consultation comments:

- Process for identifying sites flawed and not in the best interests of the public. The 'call for sites' would not have resulted in the assessment and selection of all possible available sites. The method used would capture contentious/undesirable sites that may have failed to be developed in the past for valid reasons. The

starting point should be 'where are the best places for development', and the Council should contact the landowners of suitable sites.

- Unclear whether all potential sites for development within the settlement boundary have been considered.

Council response:

The sites set shortlisted as preferred options for allocation are based upon sites put forward to the Council for the SHLAA (the SHLAA is a technical document that informs the development plan process and provides background evidence on the possibility of available land within the district). The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While there may be other, these may not be available, e.g. they may not have been submitted to the Council through the SHLAA or are not in accordance with the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

Site selection process:

Consultation comments:

- Lack of accuracy and omissions within the SA/SEA.
- Process and assessment excludes Upper Basildon, the closest neighbour to Pangbourne.
- Misleading statements within the SA/SEA indicate some form of pre-judgement or starting from a position of advantage/disadvantage.
- Sites should not be assessed in isolation from one another, without looking at the impact on the whole area.
- The search criteria have focused on ensuring an even distribution of allocations rather than a diligent and through review of where allocations would be best suited. This is evidenced by suitable sites in Compton being rejected because the Pirbright institute has been allocated. There is a need for consistency in the Council's approach to prevent the risk of legal challenge.
- Site selection and evaluations inconsistent – PAN009 and PAN010 have been rejected for reasons that apply to PAN001, eg. same distance from Pangbourne as PAN009, far greater access constraints to PAN001, and the impact on natural beauty of the landscape far greater than at PAN009/PAN010. Other sites in the district have been rejected for reasons that apply to PAN001.

Site promoter comments:

The selection process has been based almost exclusively on the suitability of individual sites and that little or no consideration has been given to the overall spatial distribution of new housing within the AONB that will result from the allocation of the preferred sites and what implications this may have for the delivery of sustainable development for the plan period.

The most sustainable locations are those which are identified in the settlement hierarchy and these are ranked or tiered according to how sustainable they are as locations for new development. On this basis, the overall distribution of new housing should reflect, and be in proportion to, the status of individual settlements within the hierarchy. We do not object to the criteria based approach, we do object to the fact that site suitability appears to have been the sole or primary basis for identification of the preferred sites included in the preferred options. The assessment does not consider how the allocation of individual sites, or combination of sites, will affect the overall distribution of housing across the District over the plan period and what implications this will have for sustainable development.

We are broadly in agreement with the assessments of PAN002 within the SA/SEA report. Some concerns and issues were raised in these assessments and we respond as follows. At the time of the assessments only limited information was available to the Council; the preparation of an outline planning application has involved the preparation of an illustrative masterplan and detailed technical reports and assessments (appendix 6, 8-12).

In light of the additional information provided, we consider that the SA/SEA of PAN002 is in need of updating. Based upon the Council's assessment of site suitability, together with the information and assessment provided, it is clear that not only is PAN002 deliverable (available, suitable and achievable), it will deliver net gains across the economic, social and environmental dimensions of sustainable development and is worthy of allocation.

Council response:

The relationship to the surrounding area and other potential neighbouring sites has been taken into consideration in the assessment of sites, and this consideration is included within the 'site selection – site assessment' section of the SA/SEA.

Unlike PAN001, both PAN009 and PAN010 were assessed as 'not currently developable' within the Council's SHLAA, and were therefore not considered any further for allocation. The primary consideration for both PAN009 and PAN010 was the impact that development would have upon the AONB.

The Landscape Capacity Assessment (LCA) for PAN009 advised that there would be significant harm to the natural beauty and special qualities of the AONB and the site should not be pursued further as a housing allocation. Site PAN010 was not subject to a LCA because it was excluded from further consideration on other grounds, ie. the site is detached from the settlement boundary. The LCA for PAN001 advised that development on the site will be acceptable subject to certain mitigation measures to reduce the potential impact on the AONB.

Other issues raised for PAN009 included the poor relationship to the settlement and the potential for access to be a constraint. For PAN010, other issues included the location of the sites within a Local Wildlife Site.

The Council's Core Strategy sets out the spatial distribution for development across West Berkshire, including within the AONB. Each spatial area has its own housing

requirement to be delivered. The purpose of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic sites across the district.

The site assessment process focused on sites that had been assessed as 'potentially developable' within 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 and local planning policy, and focus on all aspects of sustainability.

In accordance with Core Strategy policy ADPP5, the service village of Compton has some limited development potential and the site that has been shortlisted for allocation (COM004) is an available brownfield site and opportunity site which would deliver a greater level of development than that normally expected for service villages. The re-use of brownfield land is a priority in national and local planning policy taking precedent over greenfield sites. COM004 is available and brownfield which was a principle reason for rejecting available greenfield sites in Compton.

18. Settlement boundaries

Consultation comments:

- Development will breach the settlement boundary – contrary to local planning policy, eg. Core Strategy (policy CS1), Saved Local Plan policy ENV.4, and the Pangbourne Village Plan.
- Development will breach the settlement boundary – contrary to national and local planning policy, eg. ENV.4, Pangbourne Village Plan.
- No natural boundary feature for the redefined settlement boundary – this is contrary to policy.
- Redrawing settlement boundaries sets a precedent and goes against the purpose and value that they provide. Potential for sprawl to Tidmarsh and beyond and the loss of the rural identities of Pangbourne and Tidmarsh.
- No mention of further consultation or process of the review of settlement boundaries.
- Development should take place within the settlement boundary – failure to do so will fail to preserve the character of the village.
- Boundary of the site should be moved 10-12m to the west of the western boundary of the cemetery thereby enabling the cemetery and the smallholding/farm 'Chalk Hill Farm' to be enclosed by the settlement boundary. At an enforcement appeal, the Council asserted that the farm was not a viable holding, and this was supported by the Inspector. Including Chalk Hill within the settlement boundary would result in a presumption in favour of development thus providing greater flexibility in design and layout and space for a small number of additional units.

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy.

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation. There is no designated greenbelt in West Berkshire.

19. Sustainability

Consultation comments:

- The proposal is contrary to the Delivering Investment from Sustainable Development SPD – development will not provide appropriate social, economic and environmental benefits to the community as a whole, and the impact on existing residents will be significant.
- Proposal does not demonstrate a commitment to sustainable development in the village.

Council response:

The SPD ceased to exist following the implementation of the Community Infrastructure Levy on 1 April 2015.

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. The assessment of this site did not result in any significant impacts on sustainability. The SA/SEA can be viewed at:

<http://info.westberks.gov.uk/CHttpHandler.ashx?id=38059&p=0>.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Pangbourne Rejected Sites

Comments received: 1

1. General

Consultation comments:

- PAN010 assessed as ‘not potentially developable’ within the Council’s Strategic Housing Land Availability Assessment and therefore not considered as a potentially developable site within the HSA DPD for the following reasons:
 - location outside of the settlement boundary and poor relationship to the settlement (primary reason for rejection);
 - impact on the natural beauty of the landscape; and
 - location of the site within a Local Wildlife Site.
- The site can deliver a highly sustainable residential development on an unconstrained and deliverable site.
- Technical evidence supports the allocation of the site.
- Exclusion of the site should be reconsidered.
- Insufficient justification by the Council as to why PAN010 is not considered potentially developable.
- Site discounted too early within the development plan process with no sustainability assessment undertaken.
- Site owners do not wish the plan to be found unsound; however the suggested approach taken by the council does not represent the most appropriate strategy for Pangbourne when considered against the reasonable alternatives.

2. Proximity to the settlement boundary

Consultation comments:

- Appeal decision (ref: APP/W0340/A/10/2127221 dated 29 October 2010) allowed for residential development on a site 160m south west of PAN010. The Inspectors findings of note to PAN010 include the following:
 - site at the high end of the accessibility scale;
 - closeness of the site to the settlement boundary ensures the options of walking or cycling are available.
 - principle of development acceptable; and
 - degree of separation from the settlement should not in itself exclude the site as being suitable for residential development.
- In light of conclusions in the appeal decision, PAN010 is:
 - within an acceptable distance from Pangbourne village – it is closer than the appeal site to the centre of Pangbourne and the footpath routes and bus stops to it; and
 - within a sustainable location

- Well related to the existing settlement boundary – 100m away and the existing access off Bere Court Road could be utilised.
- Existing adjacent woodland and surrounding vegetation would contain the development and ensure the surrounding landscape is not compromised.
- A Sustainability Appraisal should be undertaken to determine the opportunities that the site can provide in achieving sustainable development.

3. Impact on the AONB

Consultation comments:

- Whole of Pangbourne within the AONB – any future development will have a degree of landscape or visual impact.
- Adverse impacts could be mitigated in appropriate and sustainable locations.
- Landscape Visual Impact Assessment (LVIA) for the site establishes that the topography, sloping terrain and dense boundary vegetation would sufficiently screen any future development from its surroundings and provide an opportunity for the clear separation from the open countryside to the north and the built up area of Pangbourne to the east.
- A Comparative Landscape and Visual Assessment undertaken to position PAN010 with sites PAN001 and PAN002 concludes that PAN010 and PAN001 are the most well contained due to the dense boundary vegetation and extent of mature vegetation adjacent the residential properties. PAN002 has greater visibility due to the open northern boundary and relationship to the rising land to the north of the River Thames, although there are limited areas where the site is visible from the River Thames.

4. Ecology

Consultation comments:

- Ecological Appraisal for the site considers that there are no statutory designated sites of ecological value that would be affected by any future development at PAN010.
- Site is poor semi-improved grassland and considered to be of a low value of nature conservation.
- Mature landscape boundary offers suitable habitats for a number of species and would be retained and managed in any future development proposals.
- Local Wildlife Site is adjacent to PAN010 and it relates to the ancient woodland along the south west boundary. The retention of the hedges along the boundary of the site and the incorporation of a 15m buffer zone along the south western edge of the site to protect the ancient woodland would ensure the local distinctiveness of the area is preserved.
- Proximity of the site to a Local Wildlife Site should not be a reason for exclusion.

Consultation comments post preferred options consultation:

- Since the publication of the preferred options, a planning application for the Pangbourne Hill site (PAN002) was submitted and refused. Informative 2 of the

refusal notice deals with the European Protected Species Tests of Derogation, with specific reference to dormice which were detected on and surrounding the site.

- With specific reference to Test 2 (whether there is a satisfactory alternative), the site promoter draws the Council's attention to the alternative sites put forward, such as PAN010. PAN002 cannot be considered to meet this test of derogation unless every other potential site has been fairly and consistently considered, including ecological matters. Failure to do so would be unsound.

5. Highways

Consultation comments:

- Highways and Technical Note and Transport Appraisal produced for the site.
- The site provides sufficient opportunities for walking and cycling – number of footpaths run through the Pangbourne College campus and the adjacent woodland to the site. In addition there is a footway along Pangbourne Hill from its junction with Bere Court Road to Stokes View and where the footway meets the carriageway, it continues to Pangbourne village centre.
- No specific cycle routes surrounding the site, however the nature of the surrounding roads do not discourage it.
- Possibility of direct access from Pangbourne Hill discounted due to restricted visibility and need for access across an existing open field.
- Opportunity to utilise access track from Bere Court Road. This access to the south serves three existing properties and also connects to Pangbourne College and Bere Court Road. Sufficient opportunity to upgrade the track to allow visibility splays and appropriate surfacing.
- Width of Bere Court Road narrow – there are opportunities to create passing places to address this constraint which is also common to shortlisted site PAN001.

6. Surface water drainage

Consultation comments:

- Surface Water Drainage Technical Note for site produced.
- No existing water courses within the site.
- Low probability of flooding – within Flood Zone 1.
- Due to the nature of the underlying soil across the site, Sustainable Drainage Systems (SUDs) would function well within this location with the potential for swales and balancing ponds. These would maximise the environmental and ecological benefits of development.

7. Trees

Consultation comments:

- Baseline tree survey prepared. Concludes that trees and hedges predominantly along the periphery of the site.

- Majority of trees of moderate value, however there is one veteran tree of high value on the western boundary which would require a 15m buffer.
- Any proposed development would be located towards the centre of the site to retain the existing landscaped edge.

8. Heritage

Consultation comments:

- One heritage asset within close proximity to PAN010 – Grade II* Listed Devitt House 550m south west of the site within the grounds of Pangbourne College. Topography of land and substantial woodland and hedgerows bordering PAN010 would not result in any direct harm as a result of development to the Grade II* listed house.

Council response:

The sites assessed for potential allocation within the Housing Site Allocations DPD are based upon those put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA) and assessed as 'potentially deliverable'.

The site selection process has been rigorous and the site assessment criteria, which have their basis in national and local policy, were developed to assess the suitability of a site's allocation in the DPD, and focus on all aspects of sustainability, ie. economic, environmental, and social.

All sites were initially assessed against automatic exclusion factors, and this determined which sites should be ruled out or considered further. The automatic exclusion criteria included whether sites were assessed as 'not currently developable' within the SHLAA. Sites with such an assessment imply that there are issues that could not easily be resolved within the plan period or would impact significantly on the deliverability or availability of the site.

The NPPF identifies that to be considered developable, sites must be in a suitable location for housing development with a reasonable prospect that the site is available and could be viably developed at the point envisaged.

Core Strategy policy ADPP1 is clear that most development will be within or adjacent to the settlements included in the settlement hierarchy and related to the transport accessibility of the settlements, their level of services and the availability of suitable sites for development.

For PAN010, due to the poor relationship of the site to the settlement boundary – the site is not adjacent to the settlement boundary – it was assessed as 'not currently developable' within the SHLAA and therefore automatically excluded from being assessed further for the Housing Site Allocations DPD.

The Housing Site Allocations DPD will include a review of settlement boundaries of those settlements within the defined settlement hierarchy. Settlement boundaries will be re-drawn around the developable areas of the housing allocations plus sites

which have been identified as suitable to include within a revised settlement boundary. PAN010 would not meet the settlement boundary review criteria (not a long established close knit development forming the main settlement, not an allocated housing site, not a site below the threshold for allocation, not an area with planning permission adjacent to the settlement) therefore, cannot be included within the settlement boundary.

In light of the above, PAN010 has not been re-assessed for possible allocation within the Housing Site Allocation DPD.

The comments received following the preferred options consultation that have regard to dormice on site PAN002 and the European Protected Species Tests of Derogation are noted.

The Council's ecologist has considered the ecological appraisal submitted by the site promoters and has made the following comments:

The survey identifies boundary habitat as suitable for Dormice and recommends a full season survey. Therefore one cannot rule out this species – it therefore sounds very similar to PAN002.

The survey identifies that the site could be used by commuting and foraging bats. Bat activity surveys are recommended. This is without any knowledge that the recently re-developed site to the south has significant Brown Long-eared bat maternity colonies. So this site could be very valuable for this species and other species of bat as well.

Further surveys are recommended for badgers, birds, Great Crested Newts, reptiles and Stag Beetle.

In ecological terms, I therefore see no benefit between this site and PAN002.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses - Eastern Area

EUA007: Pincents Hill

Responses received: 1210

Template responses received: 840 (69%) – 6 individual templates were used

- EUA007 template (1)
- EUA007 template (2)
- EUA007 template (3)
- EUA007 template (4)
- EUA007 003 008 031 033 template (1)
- EUA003 008 031 033 template (3)

A petition objecting to the development of EUA007, EUA008 and EUA003, EUA031, EUA033 with 2,218 signatures was submitted to the Council.

1. General

Consultation responses:

- Home buyers are not interested in Sustainable Development
- Residents will consider legal action should the scheme get approval
- Has an independent review of the area, flooding, pollution, traffic impacts, infrastructure been carried out?
- A business application to make money for people who do not even live in the area
- Development would have more negative impacts than positive
- Don't put new residents above existing residents
- Inviting Reading BC to claim control of this region of land up to the motorway
- Site sits close to the flight path of Heathrow Airport and a proposed 3rd runway
- Near site for new proposed aggregate site
- FOI request – cost to the Council of the Blue Living Planning Application and appeal
- How many unoccupied housing units owned by West Berks Council and number of potential units available within WBC brownfield sites?

Council response:

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,

- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

It is through this process that members of the public, developers and agents are able to challenge the plan; however, the Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and with Duty to Cooperate, legal and procedural requirements have been met.

Development of any site will lead to some financial benefit for the landowner and site developer. All developments are required to provide financial contributions, in terms of the Community Infrastructure Levy (CIL) to help to mitigate the impact of development on the local environment, community and infrastructure. Therefore, development does bring some benefits to existing local residents in terms of improved services and facilities.

All sites have been subject to Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. This looks at the positive and negative impacts of development of a site, and where there are significant impacts on sustainability a site would not be recommended for allocation. Mitigation measures, in many cases can reduce the impact of development, and can result in benefits not just for the development, but for existing communities as well.

There are no plans to alter the district boundary in this area.

The Eastern Urban Area is a long way from Heathrow, and whilst it may be under the flight path for some planes it is unlikely that this would have a significantly detrimental effect on new residents, even if a new runway is delivered at Heathrow.

The Council is a non-stockholding local authority, instead working with Registered Providers; therefore, the council itself does not own any housing stock. Brownfield sites are listed within the Council's Strategic Housing Land Availability Assessment (SHLAA); the SHLAA gives an indication of the size of a site and the number of dwellings that could be provided. Where there Council are aware of suitable brownfield sites these have been taken into consideration when calculating the remaining housing requirement for the DPD.

2. Principle of Development

Consultation responses:

- Why is development needed in this area? What are the reasons? Who does it benefit?
- Already densely populated area with plenty of houses
- Is this site (for 285 dwellings) really worth the colossal impact?
- Developments should be mixed use (residential, employment, amenities, leisure)
- No more new builds and flats as they are ugly
- Cannot keep building and leave the infrastructure the same
- Existing infill development has resulted in sustainable piecemeal loading of the general infrastructure
- Significant environmental, economic and social impacts
- Revocation of the RSS means there is no longer a requirement to allocation 1000 houses within the AONB. Housing building in the AONB should only address local needs (PPS7, paragraph 21)
- Not all development opportunities within the borough have been assessed
- Tilehurst ends up as the 'dumping ground' for anything 'unwanted' elsewhere
- Tilehurst has given enough quota of land to the government for housing
- There is a need for more homes, not just the number the government is proposing
- Lack of immigration control is the reason more houses are needed
- Industrialisation of the lower end of Pincent's Hill

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern spatial area. The Eastern spatial area has its own housing requirement to be delivered. The core strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Urban Area would be able to take the amount of development proposed. The Core Strategy was adopted following the publication of the NPPF.

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified on a range of factors, including sustainability and number of services and facilities available.

The sites set out in the Preferred Options DPD are selected from sites put forward to the Council for the Strategic Housing Land Availability Assessment (SHLAA). The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will

finally be allocated. While there may be other sites, these may not be available, eg. They may not have been submitted to the Council through the SHLAA (eg. the prudential site between J11 and J12 of the M4) so are not deliverable, or are not in accordance with the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement, development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

The housing type and mix of any development needs to comply with policy CS4 of the Core Strategy, having regard for the character of the surrounding area.

The southern end of Pincents Lane, including the IKEA site, is defined in the local plan as an area for retail and warehousing (West Berkshire District Local Plan 1991 – 2006, Saved Policies 2007 Policy SHOP.3), therefore, development of the IKEA store is in keeping with the designation of the area.

The publication version of the DPD will be subject to a further period of consultation, and then will be subject to independent examination. The evidence base will be independently examined as part of this process.

Coalescence of settlements

Consultation responses:

- Loss/reduction of strategic gap between settlements
- becoming part of Reading, without out any benefits
- Against West Berkshire Planning strategy/policy
- Merger of Tilehurst, Pangbourne, Purley and Tidmarsh and loss of separate identity
- Always been accepted as of paramount importance so why are they now being ignored?
- Under the impression that the Council had a discretionary power whether or not to retain certain gaps.
- Opposition to abolition of gaps between settlements
- Will not take long for Tilehurst to become a concrete jungle is more building is allowed to take place

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

Settlement boundary

Consultation responses:

- Development outside the settlement boundary
- Will set a precedent for future development outside the settlement boundary
- Development on the urban fringe will not contribute to sustainability

Council response

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

Precedent for future development

Consultation responses:

- Risk if this goes ahead that Prudential will go ahead with long term plans to fill in the entire stretch between J11 and 12 with houses
- Precedent for more dwellings once the initial 285 are built

Council response:

The Prudential site south of the M4 has not been submitted to the Council for inclusion in the SHLAA and therefore would not be considered for allocation. There are a number of issues with the site, which lead to the withdrawal of previous planning application.

The Council's landscape assessment indicates that only part of this site is suitable for development, and the site promoter are suggesting that the remaining part of the site is kept in perpetuity as open space. To ensure this the settlement boundary will be drawn around the 'developable area' of sites that are allocated and therefore, will redefine the 'settlement' area, protecting those areas outside the new boundary from development.

Should the site be allocated the area of open space would be placed into public ownership to protect it in perpetuity.

Previous scheme rejected at appeal

Consultation responses:

- Why is this site being reconsidered when it has already been rejected by the Secretary of State? Development is still inappropriate.
- Local opposition continues
- Reasons for rejection cannot be overcome/no changes have been made
- Previously rejected on grounds of traffic congestion, strain on infrastructure (policing, doctors, parking), gradient of Pincents Hill limited opportunities for walking
- Thought that there would be no future development in this area
- Why waste time/money going through the process again?
- All developers need to do it keep presenting the plan until the Council and Government accept it
- Are the developers prepared to pick up the cost of another inquiry, or do the Council tax payers have to foot the bill again?
- If the Council continue to uphold the SoS decision the developer will have no alternative but to accept the decision in the long run

Council response:

The previous scheme was submitted as a speculative planning application, which in principle was against planning policy. Therefore, the Council had an in principle objection to the site. The site promoters have put forward a considerably smaller scheme which aims to respond to and address the concerns raised at the appeal, in

particular landscape objections, and protect the majority of the site in perpetuity. This revised scheme is being considered through the plan led system, and therefore, if the site was to be allocated for development the principle of development on the site would be established as acceptable.

Planning Policy

Consultation responses:

- This site defines Calcot as rural, therefore, policies of restraint apply
- Contrary to CS2 of the BSP and Env.18 of the WBDLP which only permit development in the countryside in exceptional circumstances
- Possibly contrary to CS4 of the south east plan and policy ENV of the WBDC Local Plan Saved Policies
- Development would not comply with CS13 of the Core Strategy (Bus services reducing, less travel choice, further encouragement to use the car)
- Contrary to CS18 (Green Infrastructure) – as all sites would fit into the definition of GI as set out in the policy therefore harm would be caused and alternative GI could not be provided.
- The DPD is wholly contrary to CS policies
- Removal of space between communities conflicts with the WB planning strategy
- Policy CS19 – Development fails to meet the local characteristics of the area and does not take into account concerns of residents. Development will increase congestion and reduce the identity of Calcot, Theale and Tilehurst, puts pressure on services and facilities and reduces the quality of open spaces. There will be an increased reliance on cars, and there are insufficient leisure, health and education facilities. Development will destroy the natural features of Pincents Hill, impact on wildlife and GI. The development is not within or adjacent to existing settlement. Public Transport does not connect to the rest of the area, walking/cycling are difficult due to traffic and topography. Lack of Transport infrastructure.

Council response:

Neither policy CS2 of the Berkshire Structure Plan or ENV.18 of the West Berkshire District Local Plan are current planning policies.

The requirement to allocate sites is set out in the Core Strategy. Sites are to be allocated in accordance with the Spatial Strategy and Settlement Hierarchy, which directs development towards the most sustainable locations. All sites allocated for development would be required to comply with the policies set out within the Core Strategy.

Policy CS18 of the Core Strategy considered Green Infrastructure provision. Much of the site is proposed to be retained as open space, which would provide a significant amount of Green Infrastructure in the area as well as retaining access to the countryside beyond the site.

All sites allocated for development would be required to submit a Travel Plan, which would set out a number of measures to encourage new residents to consider walking, cycling and other alternatives to use of the car for everyday journeys. Therefore, the sites would comply with CS13.

Considering the local characteristics of the area is a crucial factor in site design for those sites which are allocated for development and is informed by a Landscape and Visual Impact assessment for each site.

Land use

Consultation responses:

- Loss of Greenfield site
- Grade 2 agricultural land
- Contains mineral deposits which could be sterilised if developed
- There are lots of brownfield sites that could be used
 - Pincents Lane is near where IKEA is to be built
 - Use of unused property in Reading – eg. properties over shops
 - Use of derelict housing
 - Use of old industrial estates that have already been destroyed by building and greed
 - Use of empty offices blocks/replacement with residential development (eg. Green Park, Theale Business Park, Arlington Business Park)
 - Did the Council take advantage of funding to unlock brownfield sites? (August 2014)
 - Lack of strong strategy in relation to development on brownfield land
 - A number of brownfield sites identified seem to have been excluded from the DPD, but were detailed in the SHLAA

Council response:

The site is not currently in active agricultural use.

Consideration of policies 1 & 2 of the Replacement Minerals Local Plan would need to be considered should the site be allocated for development and this will be set out in any policy for the site.

Where the Council are aware of suitable brownfield sites, through the SHLAA or other means, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy makes it clear that while there is a preference for the redevelopment of brownfield land, the allocation of Greenfield sites on the edge of settlements is required to meet the Council's housing requirement. Sensitive design will be important to respect and enhance the character and appearance of the area.

A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

The Council has bid for, and been awarded, money from the Thames Valley Berkshire Local Enterprise Partnership (TVB LEP) for infrastructure projects to support key development via the local growth fund¹. Two of the schemes are to enable development to go ahead on brownfield land in Newbury (Kings Road – provision of a new direct link between Hambridge Road and the A339 as part of the redevelopment of the former Sterling Cables site) and access to the London Road Industrial Estate from the A339 to enable future regeneration of the industrial estate. The third scheme the Council has been awarded funding for is in relation to access to Sandford Park. Full details of the bids are set out on the council's website (www.westberks.gov.uk/sep)

Alternative locations

Consultation responses:

- More suitable areas along the A4 between Calcot and Thatcham
- Other sites in Newbury, Thatcham have been turned down and all the sites in Tilehurst have been proposed. Many of the reasons the sites have been rejected apply to this site
- Development of less populated areas would have a lower impact
- Army Barracks recently vacated in Newbury
- There is a site in Thatcham that residents are keen to see built
- Build a junction 12A on the M4 and build a new estate there
- More economical sites must be available within the district
- Development of smaller sites already used for housing eg. the top of New Lane Hill – development of homes with larger occupancy
- Other areas of the country (eg. Scotland)

¹ A fund designed to help speed up and restart housing developments between 250 and 1499 units that have slowed down or stalled. It aims to support housing schemes which are important for local growth and meet local priorities.

- Small scale development on the edge of villages will blend in and result in less harm to areas of natural beauty
- Sites should be located close to Newbury, which is less populated than Reading and has the community hospital close by
- Regenerate Reading town before building on fields. Especially as these sites can provide small affordable homes for first time buyers.
- Development should take place in areas with less traffic, less densely populated and more greenfields so they would not suffer such negative effects on their lives

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and selected from the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy. While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

It is anticipated that a revised scheme for north and south Lakeside will be received, which will provide a similar number of units overall, but over a larger site area. It is the site promoter's intention to submit a revised planning application.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing.

The majority of minerals sites have conditions restricting the use of the land once extraction has been completed, in the majority of cases these sites are required to return to their previous natural state.

The council cannot consider sites within the Reading borough boundary.

3. Consultation process

Consultation responses:

- The views of local residents should be taken into account

- Alok Sharma has carried out a survey with local residents, over 90% people who responded are against the development
- Notification of the consultation in mid August, with first meeting to be held locally within the week
- Summer holidays when lots of people are away, about to be away, just come back from being away
- A decision that would so adversely affect quality of life should be properly consulted on
- Little engagement with local residents, who had not been won over

Council response:

The delay in publishing the revised proposed submission DPD has been to allow the Council adequate time to go through all the responses received and make sure that all comments made have been considered and taken into account.

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period started on the 25th July and was extended from the usual 6 weeks to take into account the school holidays, closing on the 12th September. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation. Direct contact was made via letter with all residents within 100 metres of the boundary of the site.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal regulatory consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

Any sites allocated for development will be required to submit a planning application for the site, which will provide another stage of consultation, this time of specific site plans, with the local community.

4. Crime and security

Consultation comments:

- Often has an impact on crime rates
- Increased population could result in greater risk of anti social behaviour

Council response:

All development will be designed to create safe environments, addressing crime prevention and community safety

5. Ecology

Consultation responses:

- Destruction of wildlife habitats and wildlife corridor for a range of species (birds, bats, badgers, deer, foxes, small mammals, reptiles, hares)
- Impact on woodland / trees (inc. ancient and TPOs)
- Removal of vegetation to provide adequate access
- Impact on Sulham Woods
- The area has an abundance of Moths, Butterflies and newts
- Removed trees unlikely to be replaced
- 60% of species are in decline, loss of habitat is only going to make this worse
- Close to/adjacent to Local Wildlife Site
- Hedgerows along Pincents Lane are protected, as over 20m in length and over 30 years old
- Impact on Moor Copse SSSI
- A number of badgers setts on the site

Council response:

All sites have been subject to initial screening by the Council's Ecologist. The site is recognised as being within a BAP habitat and BOA. An extended Phase 1 Habitat Survey would be required to accompany a planning application, should the site be allocated for development. As a significant part of the site will be retained as public open space, as well as woodland areas and trees, which should reduce the impact on ecology. All woodland areas and tree lines will be provided with a 15m buffer to ensure no negative impact on ecology.

Trees covered by TPOs can be removed with permission from the Council. Where permission is granted it is usually accompanied by conditions requiring new and additional planting.

Development of the site would need to ensure suitable mitigation was in place to prevent damage to the Pincents Kiln SSSI.

6. Economy

Consultation comments:

- Sainsbury's, Next, Boots, Dunelm might be at risk if traffic gets too bad and people start shopping elsewhere
- Traffic/congestion will mean that local business will suffer

Council response:

The consideration of traffic movements around the retail area would be considered as part of a planning application.

7. Flood risk

Consultation responses:

- Localised flooding
- Identification of surface water flood risk areas
- Groundwater emergence zones
- Flooding of Long Lane resulting in the road often being closed
- Should houses flood would the Council provide compensation?
- The site provides important drainage for surface water which would otherwise need to be taken away by the sewage system
- This is clay soil, where will the water go?
- Despite SUDs green spaces are always better for water absorption than hard standing
- The recreation ground is frequently water logged from run off
- Loss of natural soakaway
- Water has been known to flow down the hill onto the A4 and onto the Beansheaf Estate

Council response:

Flood risk on the site is low, although it is recognised that there is a small area of surface water flood risk to the north west of the site. Should the site be allocated a flood risk assessment, taking into account all sources of flooding would need to accompany a planning application. This would need to set out any mitigation measures required, including details of sustainable drainage systems (SUDs) to be provided.

8. Heritage assets

Consultation responses:

- Historical value of the area needs to be preserved – historic sunken track potentially dating back to Saxon times

- English Heritage – further archaeological work should be undertaken prior to establishing the principle of development through its allocation in the DPD. Paragraphs 139, 17 and 126 of the NPPF
- The site is close to Pincents Farmhouse a grade II listed building, but EH have not raised any concerns

Council response:

The Council's Landscape Character Assessment takes into account the historical significance of the site.

A Heritage Impact Assessment would be required.

9. Highways and Transport

Highway Network/traffic

Consultation responses:

- There has been no input from The Council's Highways Department - Planning Policy Task Group (PPTG) should have been given this expert advice before deciding on suitable sites for the DPD.
- Distance from local centres will result in increased traffic levels
- Developments that encourage people to do without cars do not work
- There will be at least 2 cars per household which will add to congestion
- Supporting transport infrastructure and parking spaces is one of the most unsustainable parts of modern life
- London style rush hour now lasts all day
- Struggle to get out of residential roads as it is
- A route from Bath Road to City Road was considered about 30 years ago, but rejected because the infrastructure around City Road, Little Heath Road and Tilehurst in general, was not able to take the additional traffic. Traffic has only got worse since then.
- Pincents Hill
 - was closed to through traffic to the north to prevent rat running
 - very narrow – 8ft wide in many places
 - Even if not opened up immediately comments/complaints from residents with issues existing the site to the south will result in access being provided to the north
 - Inspector at the appeal stated that Pincents Hill should not be opened up
 - Previously WBC contacted local residents about reopening Pincents Lane to alleviate the traffic problems on Langley Hill, but concluded it should remain closed to through traffic

- Loss of use of Pincents Hill for parking
- Pincents Hill is a quiet lane that is currently safe to walk down
- Request for Pincents Lane to be designated a Quiet Lane rejected as not in five year plan. This is the only quiet lane left in Tilehurst
- Road Maintenance is poor
- Extensive traffic calming measures in the locality indicate the stress the roads are already under
- Speeding traffic
- Rat running on local roads
- A number of highway improvements schemes are already taking place or planned to deal with increasing traffic - M4 Smart Motorway (hard shoulder running) and Duelling of the A4 from Langley Hill to the M4.
- All roads in this area travelling towards the M4 are overloaded at peak times already
- There is already gridlock coming out of Sainsbury's, which will worsen with IKEA and housing development at Pincents Hill
- Worsening traffic along the A4
- Road improvements are unlikely to make a significant difference to congestion/traffic levels
- Significant amounts of development have already taken place which has impacted on congestion
- It does not seem reasonable to make residents of a new development join a queue to get into their own homes
- Construction traffic will cause disruption
- Over 1700 cars passed Little Heath on Friday 5th Sept
- Long Lane/Dark Land roundabout is not adequate for large vehicles such as buses and lorries
- City Road is the only access to The Bird's Estate despite the original intention to allow access from Goldcrest Way. This route should be opened up
- Sulham Hill/Mill Lane to Tidmarsh is a narrow country lane
- Traffic/congestion on City Road/Little Heath Road at school drop off times
- Existing congestion along Sulham Hill/Langley Hill to the Bath Road
- New residents are likely to be commuters

Council response:

Consultation with the Council's Highways Development Control Team fed into the site selection process, and details were made available to Council members and set out within the papers for Council. More detailed Transport Assessment (TA) work has now been carried out on the Preferred Options sites. The TA work has taken into account the development of IKEA. The TA shows that development of the site itself is not expected to have a significant impact on traffic in the area; general background traffic growth is shown to significantly exceed the additional traffic from these sites.

The TA provides a worst case scenario and does not take into account mitigation, Travel Planning, or general highway improvements that improve traffic flow. Where the TA has shown a specific need for mitigation measures this will be taken forward as part of the IDP, which is a 'live' document with regular updates.

Development of this site is unlikely to impact on traffic to the north of Tilehurst.

All sites allocated for development will be expected to provide a Transport Statement/Transport Assessment which will look at the specific local impact of the development on the highway network. A Travel Plan, setting out measures to encourage alternative modes of travel to the car, will also be expected to be produced.

There are no plans to reopen Pincents Hill, however, if it was considered it would provide an additional north/south route between the A4 and Tilehurst, which could reduce traffic on Langley Hill. Improvements may be required to widen Pincents lane (if required), and provision of adequate walking/cycling routes would be considered as part of the planning application. If development was to go ahead it is likely that the existing on road parking would cease.

Survey work has been carried out in to Rat Running in the area. There is evidence of rat running, and a number of options for reducing it were subject to consultation in the summer of 2014. It was decided, due to a very low response rate, that the situation would be reviewed following the completion of the A4 widening improvements.

The improvements to the A4 (duelling), and the proposed Smart Motorway scheme for the M4 (Junctions 3 – 12) aim to improve traffic flow and journey time reliability. Smart Motorways help relieve congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limited to keep traffic moving smoothly. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth. Consultation has taken place with Highways England, who have not raised any concerns regarding the development of this site.

The issues of construction traffic would be dealt with at the planning application stage and would be dealt with through planning conditions should the site be allocated for development.

Access:

Consultation responses:

- Significant constraints with access only from the bottom of Pincents Hill

- Significant improvements would be required
- Roundabout at Sainsbury's used by buses/coaches and cars entering/existing the retail area
- To the north would adversely affect traffic passing local schools putting pupils safety at risk and impact on quiet residential roads
- Development would be agreeable as long as access via Pincents Lane South is adequate
- Using same access as IKEA and the new Berkshire Fire and Rescue HQ, Turnhams Green Industrial Estates and Calcot Retail Park
- The Council agree that access should only be allowed via the bottom of Pincents Hill
- Northern access would impact on quiet residential roads
- Access via Royal Avenue cannot be considered as it is already an overused rat-run
- No chance of access from Starlings Drive

Council response:

Access to the site is seen as a constraint to development. While the Site Promoter's Transport statement work indicates a single access to the south, using Pincents Hill, is deliverable the Council remains unconvinced that this is the most appropriate access solution for the site. There are also concerns regarding the impact of IKEA traffic, especially leaving Pincents Lane in the evening.

Impact of IKEA

Consultation responses:

- Traffic congestion is going to be horrendous
- Did the TA allow for the additional traffic?
- IKEA anticipates 1,200,000 car journeys to its store
- Unconvinced the road improvements will improve the situation. Highway improvements are required to cope with the existing situation, without IKEA and other development
- Visitors to IKEA are unlikely to walk given what they will be buying

Council response:

The impact of IKEA has been taken into account in the Council's transport assessment work. The modelling takes into account the trips likely to be generated by IKEA and the highway improvements that are to take place as a result of IKEA. Specific highway improvements are being done as a result of the IKEA development;

the A4 widening improvements provide additional capacity for existing traffic needs as well as for the additional needs as a result of the IKEA development.

IKEA do offer a home delivery service, so there is some scope for visitors to walk/cycle to the store. In addition many of the staff working at the store are likely to walk or cycle. A Travel Plan has been developed looking how staff and visitors will travel to the site.

Given the issues raised and the uncertainty about the impact of IKEA, it would be prudent to consider this site as part of the new Local Plan, allowing time for the impact of IKEA to be known prior to making any decision about allocating the site.

Parking

Consultation responses:

- Parking at local services/Facilities not sufficient to meet current demand (eg. Hilden's Drive shops/ Cornwell Centre)
- Should reduce the space for parking private vehicles
- Developers never plan to have sufficient parking spaces, resulting in cars being left in other places (eg. City Road)
- Lack of dedicated parking could result in restricted access for emergency vehicles
- Parking outside schools
- Lack of Parking at Tilehurst Station, leading to overspill parking into residential roads

Council response:

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

The issues of parking at local centres and at Tilehurst Station are noted. This site is close to Theale Station, where there parking is underused.

The issues of parking outside schools are recognised. The Council work with schools through the School Travel Planning and Road Safety processes to reduce the number of children driven to school, and to improve safety outside schools.

Public Transport

Consultation responses:

- Accessing public transport from the new development would be a significant challenge
- No.33 service being reduced this September (2014)
- Lack of PT in the area puts pressure on roads as people choose to use cars
- No way to get to Tilehurst Station except a very long walk, or to drive (3.2 miles, approx 40min walk). The station is in Reading, not West Berkshire
- Trains are too expensive and do not operate at the times required
- Additional services would be required
- Development should be no more than 10min walk from a bus stop
- Bus route along Little Health road is impacting on the safety of children walking to school
- There is no joined up public transport strategy
- No funding for improved public transport service
- Theale station is 1.3 miles from the site
- New bus routes would further exacerbate congestion
- Buses into Bitterne Avenue are now banned as residents complained buses were causing their houses to subside
- Mitigation measures would need to be agreed with Reading , in particular those relating to bus services

Council response:

There are a number of public transport services in the area, provided by Reading Buses. Regular local bus services, as well as long distance services stop at the retail area at the bottom of Pincents Hill. Once IKEA is complete there will be a service calling at IKEA, close to the site entrance. Theale Station is approximately 1.9km from the site, which is within the maximum acceptable walking distances set out by CIHT (2000) for commuting or travel to school, therefore, providing a realistic public transport route to Newbury, Reading or London as well as further afield. Significant improvements are being made to the station, including the installation of lifts.

Road Safety

Consultation responses:

- More traffic will impact on safety of those walking

- Crossing the road towards Sulham at the top of Dark Lane (subject to Road Safety Investigation)

Council response:

Road Safety improvements would be considered as part of the Site Transport Assessment as the planning application stage. It is likely that improvements would be required to Pincents Lane to ensure adequate walking/cycling routes to the A4 were provided.

It is unlikely that development of this site would have an impact on the crossing at Dark Lane/Long Lane.

Walking and cycling

Consultation responses:

- Majority of sites are not within walking distance of shops for daily provisions – site does not have direct access to shops at Hilden's Drive or Tilehurst Triangle
- Lack of cycle paths
- Use of shared space
- Development should allow many people to make their journeys without reliance on the car
- Society is becoming more obese and less active, and we are being encouraged to get out and walk, but our safe places to walk are being taken away

Council response:

The site is adjacent to the retail area at Pincents Lane, which includes a very large Sainsbury's. It is unlikely therefore that residents of this site would need to access the shops at Hilden's Drive or Tilehurst Triangle.

Improvements for walking and cycling would be considered as part of any planning application submitted for the site. It is noted that the site is currently used as a quiet route for walking and cycling, and consideration of a suitable alternative would be required.

A Travel Plan would be required to accompany any planning application on the site which would set out measures for promoting walking and cycling and encouraging alternatives to the car.

10. IKEA

Consultation comments:

- Development of IKEA is going to be intrusive enough
- The effects of IKEA have not been fully considered
- Who would want to live next to IKEA – impact on saleability of properties
- Suggest delaying this proposal until after the opening of IKEA to see what effect it has on the area

Council response:

See comments in Highways & Transport Section

11. Infrastructure

Consultation responses:

- S106 contributions are already stretched beyond the original capabilities
- Tilehurst was originally a village and does not have the facilities to cope
- Development would be agreeable as long as plans account for the need for a new primary school and Doctors surgery
- Tilehurst Parish Council have to use the Calcot Centre as there is no hall in Tilehurst
- No mention of improved facilities in the DPD
- Refuse and Recycling collections and waste sites will need to be considered
- Lack of facilities in Holybrook Parish – have to travel for shops/post office/surgeries
- Many services/facilities provided by Reading BC and West Berkshire residents are unable to benefit from concessions offered to Reading residents
- Short changed by West Berkshire for living in this area – see very little investment

Council response:

Existing pressure on local services and facilities is recognised (Schools, doctors). The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to whether any provision of additional

services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, it is accepted that this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Retail/town centre

Consultation responses:

- No centre in Tilehurst
- Closure of the post office at Sainsbury's Calcot has led to worsening of queuing at the Hilden's Drive post office – another post office will be required alongside the DPD sites
- Distance from local centres with commercial facilities such as shops, post offices, leisure centres

Council response:

It is recognised that there is no town centre in Tilehurst, however, there are a number of local shopping areas, and the site is adjacent to the Calcot Retail Park, which includes a number of retail opportunities, including a Sainsbury's. The nearest post office to the site is in Theale, less than 1.5km from the site.

Utilities

Consultation responses:

- Water supply – additional pumps will be required to supply water
- TW struggle to maintain supplies and pipework
- Sewage capacity
- Gas/electricity services
- Waste disposal
- New facilities will be installed at a cost to current residents/bill payers

Council response:

Consultation has taken place with Thames Water. Concern has been raised regarding water supply capacity and wastewater services in relation to the site. They have advised that a water supply strategy and drainage strategy would be required to assess the extent of the impact on their network and suggest mitigation/upgrades required to allow the development to take place. Further consultation with Thames Water will take place throughout the process.

Consultation has taken place with National Grid; however no concerns have been raised regarding power supplies in the area.

The Council has a duty to supply waste disposal services, and these services would be extended to any new developments. The Council is in the process of developing a Minerals and Waste Local Plan, which will look at the provision of new waste disposal facilities if, and where, these are required.

Health Care/ doctors

Consultation responses:

- GPs struggling to meet demands of current population. Takes 2-3 weeks to get an appointment
- Increasingly difficult to find GPs/Nurses to replace those who leave
- Difficult to get an appointment without additional population
- Social services under pressure
- Dentists are also under pressure
- One surgery in the area has recently closed displacing 2000 patients to other surgeries in the area
- Lack of GPs means more people are turning to A&E departments
- Theale health centre is over 125% capacity

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP).

Education

Consultation responses:

- Pressure on schools places for additional pupils, schools already have waiting lists

- Few local alternatives
- Little Heath, Springfield, St Pauls and Birch Copse are already oversubscribed
- Children unable to access local schools resulting in more traffic as children have to be driven to school
- Lack of good schools in the area (Little Heath being one of the few)
- Displacement of Reading children will cause a major problem in the area (40% pupils coming from Reading)
- Denefield has been reducing its intake for the last 2 years in order to become a smaller school
- Limited number of pre-schools
- Many school are having to build temporary classrooms

Council response:

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Leisure/recreation facilities

Consultation responses:

- Loss of open space/Green Infrastructure
 - Loss of access to open countryside
 - Loss of space for walking/horse riding
 - Loss of traffic free areas to enjoy
- Loss of space for school visits to consider wildlife/nature
- Rights of Way
 - Four public footpaths cross the site (nos. 13, 14, 15, 20)
 - Pincents Lane is the only Bridleway in the area
- There is only one park in the area
- Lack of youth facilities/provision (no youth club/youth worker in the parish)
- A swimming pool was promised for this area a few decades ago.
- Poor leisure facilities (eg. Cotswold Sports Centre)
- No library in Tilehurst
- Lack of maintenance of recreation ground/park
- Impact on Riding Stables

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. While there are public rights of way over the site, the site itself is within private ownership. The proposals for the site include a significant amount of public open space, to be retained in perpetuity, which will improve legal access to the

countryside from what is currently available on the site. The rights of way across and adjacent to the site will be retained and landscape buffers would also be required in accordance with the Council's Landscape Character Assessment. These requirements and that for the area of public open space would be included in the site specific policy in the DPD. There is potential for the public open space to include formal play areas for children and young people and for consideration of some community facilities on the site, which could include provision for young people. There are a number of organisations in the area which run youth clubs and activities for young people.

There is no commitment to, or provision of a swimming pool in the Core Strategy. There are a number of leisure facilities in the local area, although it is acknowledged that some of these are within Reading rather than West Berkshire. The nearest swimming pool to the site is Meadway Sports Centre approx 3km from the site. The 'Your Reading Passport' which gives discounts at Reading leisure facilities, is not available for those living outside Reading. West Berkshire Council offers the 'West Berkshire Card', which offers discounts at leisure facilities within West Berkshire.

There is a public library in Tilehurst; however, it is located within the Reading borough boundary. Additionally the West Berkshire mobile library visits a number of locations in the Eastern Urban Area.

Development of this site is unlikely to have a direct impact on the Riding Stables at Sulham Hill as the site is not used by the stables.

Emergency services

Consultation responses:

- Relocation of the Berkshire Fire and Rescue service will require good, unfettered access to the A4/M4
- Pressure on Police/Fire Services

Council response:

The relocation of the Fire and Rescue service HQ has already taken place. The fire station itself remains at Dee Road, until an alternative location can be found.

Future infrastructure requirements for the emergency services would be dealt with through the Infrastructure Delivery Plan (IDP).

12. Landscape/setting

Consultation responses:

- Development would result in harm to the natural beauty and special qualities of the AONB
- Loss of green buffer between AONB and existing residential development
- Impact on the AONB
- Change in character of the area
- Impact on landmarks and landscape, including green ridge to Reading
- Poor relationship to existing settlements
- Loss of tranquillity/quiet area
- The site is considered to be an area of AONB
- Little green space left in Tilehurst
- Change in character of area
- While only part of the site is currently proposed it is almost inevitable that the remaining land will in time be submitted for development – it is less contentious to develop smaller areas over time than development the site all in one go
- The site provides a buffer between housing in Tilehurst and industrial/commercial uses at the bottom of the hill
- Incursion into the fringes of Sulham Valley
- Topography
- Few green areas accessible without a car
- No consideration for maintaining the AONB
- Should not be building on Greenbelt/loss of greenbelt
- The site is in open countryside where policies of restraint apply
- The site was once classed as being ‘in’ the countryside, now it is ‘on the edge’
- Better siting of the site away from the AONB would have less impact from a range of viewpoints
- Loss of tranquillity
- Presence of sink holes across the site

Council response:

The site is located adjacent to the AONB. The revised scheme for the site takes into account the comments made by the inspector at the planning appeal and aims to create a development that does not impact on the character of the Landscape.

West Berkshire does not have any designated Green belt land.

The Council's Landscape Character Assessment (LCA) states that development on the western and northern part of the site would result in harm to the natural beauty and special qualities of the AONB. The LCA makes a number of recommendations regarding the development of the acceptable area of the site.

The site as a whole is adjacent to the existing settlement, but the residential area has been planned to respect the landscape of the site and to respond to the issues

raised by the previous planning application for a larger amount of development at the site. There will be significant open green space next the existing settlement. Additionally, development of the site would provide a range of community facilities that would help to build community within the development.

The presence of sink holes will be considered as part of any site survey work carried out prior to the commencement of development.

13. Personal

Consultation comments:

- Impact of the loss of open space on physical and mental wellbeing

Council response:

Development of the site would provide a significant amount of public open space as well as retaining the existing rights of way across the site. Access to the countryside is likely to be improved as a result of this site being developed as the whole of the northern part of the site would be set aside as public open space in perpetuity.

14. Pollution

Light pollution

Consultation responses:

- impact on the AONB
- Loss of dark night skys/views of stars

Council response:

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution.

Noise pollution

Consultation responses:

- A4 widening has already caused a rise in noise levels due to removal of trees

Council response:

It is unlikely that development of the site will have a significant impact on noise pollution levels. Noise mitigation measures are being installed along the A4 as part of the widening works, which should reduce the noise impact from the road.

Air pollution

Consultation responses:

- *Contributions to climate change*

Council response:

All development is required to reduce carbon emissions in line with policy CS15 of the Core Strategy.

15. Comments from the site promoter

Development potential

- Primarily residential development incorporating affordable housing, with potential for mixed use
- Potential for inclusion:
 - Specialist accommodation
 - Community facilities
 - New open leisure/recreation space
 - Small-scale indoor leisure facility
 - Ancillary retail
 - Ancillary employment/homeworking provision
- Developable area of 6.4ha – 9.5ha, giving potential for 225 – 330 dwellings at 35dph.

Access

- Obtainable from south west (Pincents Lane)
- Potential for access from the north (Pincents Lane)

Topography

- Development will be focused on the lower, less sloping parts of the site.
- Some landforming may be required

Utilities

- Utilities studies carried out for the previous planning application did not show any constraints

Previous scheme

- Judged as causing unacceptable harm to the landscape character of the area
- Higher slopes are visually prominent and therefore constrain development
- Developable area will be subject to a formal Landscape and Visual Impact Assessment.
- The site promoter will work in cooperation with the Council so agreement on the capacity of the site can be reached at an early stage
- The inspector found that some development of the site could be acceptable, and that there could be benefits through the delivery of a range of housing and other facilities on the fringe of a settlement

Open Space/Rights of Way

- The site is in private ownership, although it is currently open land and popular locally
- Rights of way would be retained
- Development would incorporate a substantial area of public open space
- Potential for part of the site to be retained for agricultural use

Transport Advice

- Carried out for a development of approximately 250 dwellings
- A single access point from Pincents Lane at Pincents Manor, with the only route into the site coming from the A4, via the roundabout at Sainsbury's – meaning the development will have little or no impact in the Tilehurst area. A single access point is considered acceptable
- The Transport Assessment Report for the previous application was agreed by the Council. A smaller development will have less of an impact on the highway network than that already agreed.
- Traffic generation expected to be :
 - Am peak – worst case – 154 trips
 - PM peak – worst case – 116 trips
 - It is anticipated that a 10% reduction in these rates could be achieved through various travel planning measures and demand management techniques
- The TA looked at the destination of journeys:
 - Central Reading 26%,
 - Local journeys 13%
 - Wokingham 8% and Reading West 8%
 - Theale 7% and Newbury 7%
- Traffic on the local highway network at 4 junctions is considered significant. There is a commitment for improvements at these junction to be made to enhance their capacities, on top of the work IKEA have already proposed.
 - M4 J12
 - Roundabout at Sainsbury's / Pincents Lane / A4

- Roundabout at Royal Avenue and Charrington Road / A4
- Crossroads at Old Bath Road / A4
- A full Transport Assessment would accompany a planning application and be subject to discussions with the Highways Agency and the Council
- Public Transport
 - IKEA have proposed a 15min bus service to their site, which is approx 450m from the access point of the site which will benefit those living in the development
- Walking & Cycling
 - IKEA have proposed a cycle way extending to their store from the south
 - A footway already exists on the north/east carriageway of Pincents Hill from the site to the proposed IKEA store
 - Consideration will be given to other work that could tie-in with the IKEA proposals to aid accessibility to the site and promote sustainable transport options

Landscape

- The proposed developable area takes into account the key concerns set out in the inspectors report for the previous application
- A significant are of open landscape/public open space is retained inc. an area at the centre of the site
 - Links would be maintained to the playing fields to the south, the AONB and Harefield Copse, Withy Copse and Oliver's Copse.
 - The area would comprise 2.12ha as pasture land and 10.97ha as open space
- Development area focused to the south-west part of the site where its low topography minimises the views into the site from the AONB
- Reduction in the extent of the developable area (5.25ha in the western area and 1.19ha in the eastern area)
- Substantial landscape buffers surrounding the proposed development. Separating the western developable area from the AONB ensuring the landscape character is maintained and enhanced at the site's boundaries
 - 15 – 20m deep buffer with semi-mature native trees to sit in the context of the surrounding woodland areas along the Western buffer area – Maintaining the visual buffer between Tilehurst and Calcot and Theale
 - 15 – 25m buffer in a similar fashion along the eastern buffer – shielding the site from Farm Drive, Starlings Drive and Magpie Way
 - Maintenance of a clear view northwards from the playing fields
 - 15m buffers would be provided between the development and existing trees and hedgerows and biodiversity habitats
- Pincents Lane itself, north of the existing barrier would be preserved as a sunken lane and would not be changed or opened to increased vehicular usage, preserving the lane's function as a clear edge to the AONB

- Developable area has been defined with the purpose of setting the majority of new development in the context of the already developed commercial area
- Attenuation area and other SUDs will be provided, potentially within the landscape buffers
- A smaller, discreet development area could be located towards the east of the site
- No vehicular access to the east of the site, but there are already a number of walking/cycling routes which would be retained

Council response:

Comments noted. The Council wants to wait and see what impact IKEA has on the local highway network before assessing the potential of allocating further development in the immediate area. The site will be reconsidered for allocation as part of the new Local Plan.

The Council have had additional landscape work carried out, which slightly changes the acceptable developable area of the site, and indicates that the proposed eastern development area is not suitable for development. A number of mitigation recommendations are included within the report that would need to be adhered to should the site be allocated in the future.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA003 & 008: Stonehams Farm

Responses received: 1370

Template responses received: 975 (71% of all responses), a further 16 responses were based on a template. 12 individual templates received:

- EUA003 008 template (1)
- EUA003 008 031 033 template (1)
- EUA003 008 031 033 template (2)
- EUA003 008 031 033 template (3)
- EUA007 003 008 031 033 template (1)
- EUA007 003 008 031 033 template (2)
- EUA007 003 008 031 033 template (3)
- EUA003 008 033 template (1)
- EUA003 008 033 template (2)
- EUA003 008 033 template (3)
- EUA007 template (1)
- EUA007 template (2)

A petition objecting to the development of EUA007, EUA008 and EUA003, EUA031, EUA033 with 2,218 signatures was submitted to the Council.

NB: All references to ‘the site’ refer to both EUA003 and EUA008, which are being promoted separately.

1. General

Consultation Comments:

- Impact on existing property values
- EUA032 has been rejected – this site has the same issues
- Unknown impact of IKEA on the local area
- Threat of legal action
- Building more houses will attract more business which will lead to more housing demand – development should be directed to the Midlands and North of England
- The site is owned by a member of staff at West Berkshire Council – surely this is a conflict of interest
- Significant financial gains for land owners from developing sites

Council Response:

One of the government’s aims in building more housing is to improve affordability of new houses. The impact on existing property values is not a consideration of the planning process.

EUA032 was rejected largely due to its poorer relationship to the existing settlement pattern, issues over access and the proximity to ancient woodland to either side of the site. While all the sites in the Eastern Area have some issues in common, with EUA032 the combination of issues on the site meant that it was not taken forward as a preferred option.

It is acknowledged that there are some unknowns regarding the impact of IKEA. A Transport Assessment was submitted alongside the planning application for IKEA. This was considered acceptable by the Council, subject to the mitigation measures to be provided. The details from this TA have been included in the Council's Housing Site Allocations DPD Transport Assessment work; therefore, the traffic impact from IKEA has been taken into account.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

It is through this process that members of the public, developers and agents are able to challenge the plan; however, the Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and that the Duty to Cooperate, legal and procedural requirements have been met.

New development is required to meet West Berkshire's housing need. This takes into account the growth in employment that is likely to be seen over the Core Strategy period.

A member of Council staff is a part owner of the site. This was declared to the Council at the start of their employment with the Council. They do not work within the Planning Policy Team and have had no involvement with the development of the DPD.

Development of any site will lead to some financial benefit for the landowner and site developer. All developments are required to provide financial contributions, in terms of the Community Infrastructure Levy (CIL) to help to mitigate the impact of development on the local environment, community and infrastructure. Therefore, development does bring some benefits to existing local residents in terms of improved services and facilities.

2. Principle of Development

Consultation Comments:

- Development should only take place on land within West Berkshire
- Significant opposition to development
- Recommend removing EUA003 from the allocation to reduce the site area
- Setting precedent for future development within the AONB
- A large number of houses have recently been developed within a mile of the site
- Do not want to see development joining up with the Berkshire Circular Route footpath
- The site is not surrounded by residential development – this statement is misleading
- Communities need mixed use developments (residential, employment, amenities and leisure facilities) that reduce the need to travel by car
- Creation of a concrete jungle
- Cumulative impact of all sites developed
- Sustainability should be defined from economic, social, environmental and community viewpoints rather than prospective developers
- Additional development is not sustainable
- Feeling of dumping development away from Newbury – making it Reading's problem
- Affordable housing is not affordable
- In the last 14 years Long Lane has had 7 new residential developments. The whole area south of Dark Lane has become developed
- Tilehurst does not have any special designations (listed buildings/heritage sites), but it is highly valued by local people
- Significant amount of open space has been lost to housing over the last few years
- A recent planning application for a house whose garden backs on the AONB was refused – lack of consistent approach
- Out of context with the established character and layout of the area and outside the settlement boundary. Would cause harm to the environmental quality of the area
- Generation of urban sprawl

- Previous appeal at Pincents Hill (EUA007) – the same reasons for refusal at the time still stand (transport, infrastructure, landscape, closure of the strategic gap between Reading and Theale). This site has the same issues

Council response:

The site is located within the West Berkshire Local Authority Boundary and has been submitted to the Council for inclusion within the SHLAA, and therefore, it is appropriate to consider the site for development.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Spatial Area. Each spatial area has its own housing requirement to be delivered. The core strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Urban Area would be able to take the amount of development proposed. The Core Strategy was adopted following the publication of the NPPF.

The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution.

Reading Borough Council was consulted on the Core Strategy, and is therefore aware of the housing requirements for the Eastern Urban Area. This part of West Berkshire has a close functional relationship with Reading, and West Berkshire Council will continue to work in partnership with Reading to address cross boundary issues and requirements through the Duty to Cooperate.

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified based on a range of factors, including sustainability and number of services and facilities available.

Area Delivery Plan Policy 4 sets out that sites will be allocated to fulfil the requirements of the Core Strategy, including some on greenfield land.

The sites set out in the Preferred Options DPD are selected from sites put forward to the Council for inclusion in the Strategic Housing Land Availability Assessment (SHLAA). The sites included in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While there may be other sites in the area, these may not be available, e.g. they may not have been submitted to the Council through the SHLAA (eg. the prudential site between J11 and J12 of the M4) or are not in accordance with

the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy.

The housing type and mix of any development needs to comply with policy CS4 of the Core Strategy, having regard for the character of the surrounding area.

All sites have been subject to a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis. The assessment of this site did not result in any significant impacts on sustainability.

Only part of the site is proposed to be allocated for development, in accordance with the area indicated in the Council's Landscape Assessment, therefore, development will not join up with the Berkshire Circular Route footpath which crosses the site. The revised settlement boundary will go around this area and will redefine the 'settlement' area and protect those areas outside the new boundary from development.

The cumulative impact of all the sites in the Eastern Urban area has been considered as part of the Council's Landscape Assessment and through other parts of the evidence base including the Transport Assessment. The updated Infrastructure Delivery Plan will also consider the in-combination effects of development.

Affordable Housing is defined by the NPPF as social rented, affordable rented and intermediate housing (eg. shared equity) provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable rented housing is let by registered providers of social housing (such as a Housing Association), and rent controls are in place that require rent of no more than 80% of the local market rent. "Low cost market" housing is not considered as affordable housing for planning purposes.

Loss of views from existing properties is not a planning issue and therefore, there is no requirement to compensate property owners for any change to the view from their property.

The holistic development of the sites will be sought through a policy for the sites.

The previous application at Pincents Hill was submitted as a speculative planning application, which in principle at this time was against planning policy.⁰ Therefore, the Council had an in principle objection to the site. The site promoters have put forward a considerably smaller scheme which aims to respond to and address the concerns raised at the appeal, in particular landscape objections, and protect the majority of the site in perpetuity. This revised scheme is being considered through

the plan led system, and therefore, if the site was to be allocated for development the principle of development on the site would be established as acceptable.

Housing Numbers

Consultation comments:

More sites than needed have been identified in the DPD, therefore, this site can be removed

- The proposed number of dwellings only make a minor contribution to the overall requirement (0.2% EUA003 and 0.4% EUA008) therefore, they could be removed and the Council would still achieve its overall objective
- The regional tier of government who sets housing numbers has been abolished, therefore, the need to sacrifice green spaces if specific housing numbers no longer have to be met is questioned
- Development in Newbury/Thatcham will not cause the same level of harm as development in Tilehurst
- Development, especially in or adjacent to the AONB, should not support the growth of Reading
- A significant increase in supply would help stabilise property prices and increase affordability for more people
- Further obligation on the Council to fully consider the likelihood of extra homes coming from windfall sites, infilling, empty homes being brought back into use and conversion of non-residential buildings

Council response:

The Preferred Options DPD did set out a number of options for sites within the Eastern Urban Area, from which the most suitable would be allocated following the consultation. Enough sites need to be allocated within the EUA to provide a degree of flexibility to the Council's housing supply.

The Core Strategy sets out that the Eastern Urban Area will require new homes to support the growth of the Reading area, and that the allocation of sites will be required. Although the sites are in the AONB, landscape assessment work carried out on behalf of the Council indicates that part of the sites is suitable for development subject to appropriate mitigation measures.

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the

Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement of approximately 1,000 dwellings. In comparison the Eastern Spatial Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings at March 2015.

A windfall allowance has been taken into account when calculating the remaining housing requirement for the district.

Planning Policy

Consultation comments:

- Against the NPPF
 - Allocation of the site goes against the principle of contributing to protecting and enhancing our natural, built and historic environment
 - Chapter 8, para 72 – There are insufficient services/facilities to meet the needs of existing and new communities.
 - Chapter 8, para 73 – allocation of the site would take away open space, which should be protected.
 - Chapter 8, para 74 – the criteria for taking away open space/recreation ground etc. are not met.
 - Chapter 8, para 76 – Local communities have not been given an opportunity to identify special areas that are of particular importance to them.
 - Chapter 9 – development would be in conflicts with the purposes of green belt land.
 - Chapter 11 – the site is in the AONB so is wholly contradictory to this.
 - Chapter 11, para 118 – planning permission should not be granted when it would result in the loss or deterioration of irreplaceable habitats (inc. Ancient woodland).
- Against the Core Strategy
 - CS17 (Biodiversity) – will not conserve or enhance biodiversity
 - CS18 (Green Infrastructure) – no evidence seen that the Council should agree that this area of GI can be lost or that an alternative area of equal/greater size will be provided.
 - CS1 (Delivering new homes) – the site is not PDL, adjacent to ancient woodland and AONB which prevents it from being suitable, no mention is made of strategic sites in the Eastern area.
 - CS14 (Design Principles) – there is no way allocating this site for housing will preserve the character, landscape or biodiversity of the area.
 - CS13 (Transport) – Traffic impact on road safety, congestion. There needs to be some realistic/genuine plans to improve local infrastructure before the site can be allocated.

- CS19 – development will not conserve local characteristics, will increase congestion, and will eliminate space for wildlife corridors and decrease GI, transport infrastructure is inappropriate and development will fill to protect or enhance the quality of the landscape/environmental assets.

Council response:

The NPPF states that the development plan, in this case the Core Strategy, is the starting point for decision making. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF aims to proactively drive and support sustainable economic development to deliver homes and businesses, and requires Local Authorities to identify and meet their housing need, taking account of market signals and setting out a clear strategy for allocating sufficient land for development.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

The requirement for the allocation of sites, including Greenfield sites, for development is set out in the Core Strategy. All allocated sites will be required to comply with the policies of the Core Strategy.

Consideration of the local character of an area is a crucial factor in site design.

Areas of landscaping, buffers and public open space, including a play area are proposed for the site (as set out in the indicative framework plan).

A travel plan would be required to accompany a planning application for the site; this would set out a number of measures to encourage new residents to consider walking, cycling and other alternatives to use of the car for everyday journeys.

Land use

Consultation comments:

- Land use – Greenfield/brownfield sites.
- Loss of agricultural land (A1 quality land).
- Lots of brownfield sites in existence which could be used.
- Brownfield sites have not been referenced in the SHLAA2013 – Eastern Urban Area document.

- A comprehensive list of all brownfield sites should be provided.
- Employment boundary review has yet to take place – this should be done before housing sites are allocated as it could reduce the number of Greenfield sites required.
- Sufficient brownfield land for 10 years worth of development before Greenfield development is required.

Council response:

The Core Strategy is clear that Greenfield land will need to be allocated in order to meeting the Council's housing requirement.

Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement, development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

Alternative locations

Consultation comments:

- Use of unused property in Reading (Oxford and Dee Roads).
- Near to IKEA.
- Why have 9 sites in Thatcham and 10 sites in Newbury been rejected?
- Thatcham should be considered for more development – it has better infrastructure/amenities and is closer to Newbury.
- Use of Horncastle Ford site.
- Theale Lakeside should be being built.
- Use of former mineral extraction sites for residential development.
- Suggest areas round Hungerford, Upper Basildon, Boxford, Wickham, Winterbourne and Theale are considered – there is lots of land available – support local communities.
- Use of empty offices (Green Park, Theale Business Park, Arlington Business Park).

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council through the preparation of the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the settlement hierarchy. While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

It is anticipated that a revised scheme for north and south Lakeside will be received, which will provide a similar number of units overall, but over a larger site area. It is understood to be the site promoter's intention to submit a revised planning application.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development, it would be against current planning policy for the Council to allocate these sites for housing.

The majority of minerals sites have conditions restricting the use of the land once extraction has been completed, generally these sites are required to return to their previous natural state.

3. Coalescence of settlements:

Consultation comments:

- Loss/reduction of the Strategic gap between settlements
- Extends the borders of Reading west into the countryside
- Loss of gap between settlements (Tilehurst/Pangbourne, Calcot/Theale) – that gaps between Tilehurst and Purley and Tilehurst and Calcot have already gone
- Risk becoming physically part of Reading

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in

allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

4. Consultation

Consultation comments:

- Letters received were not marked as being from the Council and so were easily confused with junk mail
- Serious questions over whether it was run fairly and to the best of the Council's ability
- Lack of time to respond adequately to the consultation
- Consultation held during the school holidays
- The planning portal is unwieldy and time consuming to use which stopped many people submitting an objection

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the statutory 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation. Every household within 100 metres of one of the preferred sites was sent a letter to inform them of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination, together with the comments made.

5. Crime and Security

Consultation comments:

- Increases in population and density resulting in higher crime rates, in particular anti-social behaviour
- Existing anti-social behaviour issues in the area

Council response:

All development will be designed to create safe environments, addressing crime prevention and community safety.

6. Cultural Heritage/Historic Environment

Consultation comments:

- Evidence of a large battle in the dark ages – archaeological consideration required.

Council response:

The Site promoter has carried out an assessment of the historic environment. This has found that there is some evidence of historical assets these are unlikely to constrain development.

7. Design

Consultation Comments:

- Development would need to be sympathetic to the AONB
- Development should be allowed to go up, rather than out resulting in urban sprawl
- Potential for 3 storey dwellings to tower over existing dwellings
- Need more 3/4 storey buildings which can provide entry level (affordable) flats for the younger generation

Council Response:

Development will need to comply with the policies of the Core Strategy, and be in line with the Council's quality design guidance and Manual for Streets. All development will need to take into account the character of the area.

The density of surrounding developments ranges from approximately 14dph at Barbara's Meadow and Conifer Drive, to 27dph at Highworth Way/The Knoll, and 34dph at Clements Mead, meaning that a density of approximately 30dph on this site would be appropriate.

Detailed design and site layout is a matter to be discussed at the planning application stage.

8. Ecology

Consultation comments:

- Destruction of wildlife habitats and wildlife corridor for a range of species (birds (inc. Skylarks & Red kites), bats, badgers, deer, foxes, small mammals, reptiles, insects (inc. bees) – some of which are protected/endangered species
- Removal of vegetation to provide adequate access
- Loss of agricultural land/grazing land
- Pressure on nearby ancient woodland (Sulham Woods) and trees (inc. those protected by TPOs)
- Disturbance due to trampling, litter, fly tipping
- Impact on trees due to highways improvements (road widening)
- Specific wooded areas specifically designed for badgers
- Impact on wildlife flowers
- Proximity to SSSI which could be damaged by development (Sulham Woods) various remediation costs could be imposed on the Council if damage occurs
- Impact of domestic pets on wildlife
- RSPB campaigning against the loss of woodland, hedgerows and wildlife habitats

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options. Ecological survey work has been carried out by the site promoters for EUA008 these set out a number of recommendations to limit, and reduce the impact on ecology. The Council's ecologist is content that, subject to the mitigation measures set out in the Ecological survey, there will not be a detrimental impact on ecology. Details of the measures required will be included within the site policy.

In respect of site EUA003, the Council's ecologist has advised that an extended phase 1 habitat survey alongside any follow up surveys recommended must be submitted with any planning application should the site be allocated.

Trees protected by TPOs can be removed, with prior approval from the Council, usually permission is approved subject to alternative planting being provided on the site.

Further Ecological Assessment would be required to accompany any planning application for the site.

Natural England has asked that consideration is given to the potential impacts on recreational disturbance and pressure on the Sulham and Tidmarsh Woods and Meadows SSSI. Good design and adequate buffers and education of new residents should ensure there is no significant impact.

9. Employment

Consultation comments:

- Loss of farm which will lead to a loss of employment – Stoneham Farm is used by at least 3 local businesses who would have to relocate
- Lack of local employment opportunities meaning people need to commute

Council response:

Both sites are privately owned and being promoted for development on behalf of the landowners.

There are a number of employment opportunities in the Eastern Urban Area, with Arlington and Theale Business Parks to the south, and good links from Tilehurst Railway station to Reading and Oxford.

10. Flood Risk

Consultation comments:

- Localised flooding is a significant issue. Long Lane is often closed in winter due to flooding.
- Identification of surface water flood risk areas
- Groundwater emergence zones/ surface water risk area
- Water seepage from the sites is common
- EUA003 has seen significant flooding issues
- Surface water drains are unable to cope
- Water seepage from fields adds to flooding issues in Long Lane
- Since Denefield Gardens was completed water runoff has worsened

- Despite SUDs flooding will still be an issue – green spaces are always better than hard standing at absorbing water
- The sites can be waterlogged even in dry periods
- WBC's Flood Management Strategy (2013 – 2017) recognises localised flooding as a problem, with sewer systems designed for a 1 in 30 storm and highway drainage designed for 1 in 10 storm, any event over this level will result in overland flow resulting in localised flooding
- Risk of sink holes

Council response:

Flood risk on the site is low. The site promoter for EUA008 has provided a Flood Risk Assessment for the site. This has been reviewed by the Council's flooding team, and further work is required to set out mitigation measures. This will be required as part of any planning application for the site. Sustainable Drainage Systems (SUDs) will need to be provided to reduce the risk of surface water flooding. The issue of flooding on Long Lane is noted. The area is recognised on the Environment Agency's flood maps as an area of deep surface water flood risk. Some improvements have been made to improve drainage to reduce the risk of flooding.

11. Highways and Transport

Consultation comments:

- Distance from local centres will result in increased traffic levels
- Lack of road maintenance
- Limited routes in/out of the area
- The NPPF states that schemes should be refused on transport grounds if the cumulative impacts are severe – in this case, with all 4 development there will be a detrimental impact on traffic and therefore, it is contrary to policy
- Transport Assessments accompanying planning applications for the sites will need to consider implications in Reading as well as West Berkshire.

Highway Network/Traffic

Consultation comments:

- Congestion and traffic disruptions
- Impact on Long Lane, Dark Lane, Sulham Hill, Little Heath Road, City Road, Park Lane, Langley Hill, Westwood Glen, Chapel Hill
- Use of local roads to access the M4
- M4 to be made into a Smart Motorway - use of hard shoulder running
- Long Lane is narrow

- Country roads are used for rat running to avoid A4/Langley Hill
- Country roads are unable to cope with HGVs
- Speeding traffic along local roads is an issue
- Local roads are impassable in snow – and no snow clearance equipment was provided
- Sulham Hill would need upgrading all the way to Tidmarsh
- Local traffic count carried out on 4th Sept counted 750 cars in the morning peak (7am – 9:30am) using Long Lane
- Several blind bends/poor sight lines at junctions
- Traffic calming has resulted in other areas becoming rat runs
- 464 daily vehicle trips from the 3 sites on Long Lane would be a 35% increase in daily traffic flow
- Opening up Pincents Lane to the north would create even greater strain on the road system drawing traffic from Pangbourne and West Reading
- Additional on Reading's highway network - mitigation may be required
- Traffic count during school holidays 1200 cars, in term time 1694, an increase of 41% in traffic
- Roads are not wide enough for 2 way traffic

Council response:

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion.

The site promoter has submitted a Transport Statement (TS) for the site, which considered the impact on all the local road junctions around the site. The TS has been independently reviewed, and it shows that development of the site will not cause a significant impact on local roads of junctions.

The TS states that there is no need to widen Long Lane, however, the Council's Highways team require widening to take place on Long Lane, and improvements to the junction with Long Lane and Sulham Hill.

A Transport Statement/Assessment would be required to accompany a planning application for the site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car. The TS/TA will need to consider the impact of the development on the local road network and suggest mitigation measures if required.

The improvements to the A4, and the proposed Smart Motorway scheme for the M4 aim to improve traffic flow and journey time reliability. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth.

Access

Consultation comments:

- Access – significant improvements required to the highway and footpath networks, resulting in removal of vegetation. Poor visibility
- Need to widen Long Lane (between Vicarage Wood Way and Sulham Hill)
- Poor sight lines at junction in the area
- Area has limited options for alternative modes of travel to the car
- Traffic survey work was carried out during the school holidays by an unknown party

Council response:

The site promoter has indicated that adequate access, with suitable visibility splays can be provided, between the two existing mature trees fronting the site. Some limited vegetation removal may need to take place, but this would not include the removal of these mature trees. This access is considered acceptable

Public transport

Consultation comments:

- Remote from limited public transport services (2.5km to Tilehurst railway station, 4 miles to Theale Station)
- Limited public transport services – 2 bus services No. 16 and 33 (1km to bus stops)
- Existing bus services are at capacity in the morning peak
- New development should be within 10 min walk of a frequent bus service
- Continual reduction of bus services in the area
- Lack of joined up Public Transport Strategy
- Reduced subsidy for Newbury – Reading bus service has resulted in increased fares
- Tilehurst Station is small and only manned part time
- All buses get stuck in traffic as there is no bus propriety

- The NPPF requires LAs to work to support infrastructure necessary for sustainable development – this is not happening as bus service frequencies are decreasing
- Increased funding for bus services would result in more direct routes more frequent services
- Increased demand for Reading bus services – mitigation may be required
- No direct bus service to Newbury

Council response:

There are regular public transport services throughout the Eastern Urban Area, provided by Reading Buses, with a number of bus stops within half a mile of the site. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application. These sites are approximately 2.5km from Tilehurst Railway Station, this is just over the CIHT's "acceptable walking distances" for commuting or travel to school, which is set at 2km (CIHT, 2000), however, it is within cycling distance.

It is noted that there is a need for additional car and cycle parking at the station. The Council will work with Reading BC and First Great Western to determine what improvements would be possible.

Walking and cycling

Consultation comments:

- No cycle paths in the immediate area, none provided within the West Berkshire area
- Impact on rights of way
- Lack of cycle parking facilities at Tilehurst Station
- Very narrow pavements throughout the whole area

Council response:

The site promoter is proposing to provide a footpath from the site linking into the existing footway at the Long Lane, Dark Lane roundabout. Cycle linkages will also be sought, including between the 2 parts of Stonehams Farm.

There is a provision of an on road signed cycle route from Little Heath School into Reading (R50).

Parking

Consultation comments:

- Overspill parking onto roads outside the development areas
- Limited parking at local centres/facilities (Cornwell centre, local shops)
- Parking at the top of Dark Lane towards Vicarage Wood Way indicates that area is already at capacity
- Current policy of limiting parking spaces will result in overspill parking on roads
- Lack of parking at Tilehurst Railway Station
- Space for Car Club vehicles should be provided while reducing the number of private car parking spaces

Council response:

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been prepared as part of this DPD. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is a recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

The Council are looking to pilot a Car Club in Newbury, should this be successful expansion across the district will be considered.

The issues of parking at local centres and at Tilehurst Station are noted. Parking outside schools is recognised as an issue across the district. The Council work with schools through the School Travel Planning and Road Safety processes to reduce the number of children driven to school, and to improve safety outside schools.

Road safety:

Consultation comments:

- Additional traffic impact on road safety
- Road Safety due to existing in street parking
- Safety of children walking to school
- Sulham Lane is used by Hall's Place equestrian centre, impact on safety of horses and riders
- Pavement parking can lead to people needing to walk in the road
- Concern over safe routes to school
- Safety for cyclists using rural roads
- There has been a number of near misses with children walking to school around Long Lane, Dark Lane, Chapel Hill

- Safety crossing Dark Lane/Long Lane – a case has been logged with WBC and is under review

Council response:

Concerns over road safety are noted. Improvements will be necessary at the junction of Sulham Hill with Long Lane. There is also potential for improved crossing facilities at several junctions to improve road safety.

12. Infrastructure

Consultation comments:

- Local services (doctors/schools) already struggle to cope with current demand and are oversubscribed
- Dependence on services/facilities provided by Reading Borough Council
- Despite developer contributions there will not be enough money for the infrastructure improvements required
- No provision of additional services is made in the DPD
- Tilehurst was built as a village and does not have the services or facilities required for a larger settlement
- WBC does not have the funding to provide proper facilitation in the area

Council response:

Existing pressure on local services and facilities is recognised (Schools, doctors etc). The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Education

Consultation comments:

- Pressure on local schools.
- Increasing class sizes impact on standards.
- Early Years/Nursery provision at capacity.
- Many children come from Reading.
- Children unable to get into local schools resulting in more traffic.
- Birch Copse has seen an increase of around 20% in the last few years and now has twice as many pupils as it was originally built to serve.
- Little Health is now suffering from poor educational standards.
- Forcing Reading pupils out of West Berkshire schools will cause a major problem in the area.
- Denefield has been reducing its intake for the last 2 years in order to become a smaller school.
- Concern school catchments will change to take into account new development meaning the once 'local school' is no longer local.
- Development could generate demand for between 200 and 300 school places and may require a new 1 – 2 form entry school or expansion to an existing school.
- School place allocation for 2014 shows there is no spare capacity at the local schools, and many have waiting lists.
- Loss of opportunities for outdoor education.

Council response:

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Medical services

Consultation comments:

- No surgery in the immediate vicinity.
- 3-4 week wait for doctors appointments are not uncommon.
- One local surgery is closing.
- Pressure on dentists.
- RB Hospital is already catering for twice the number of patients it was built to accommodate.
- Doctors surgeries are not on a bus route.
- The nearest NHS dentist taking new patients is 3 miles away.
- Mental health services are over stretched.

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP) which is prepared in consultation with service providers.

Recreation/leisure

Consultation responses:

- Loss of access to open fields, woodland, recreation and leisure facilities.
- Impact on Cornwell Centre and recreation ground (EUA031 only) limited parking.
- People travel to this area to walk.
- No local swimming pool – one was promised years ago.
- Unable to make sure of Reading's leisure discounts (Passport to Leisure).
- Poor leisure facilities in the area – Cotswold Gym is poorly equipped.
- Lack of Youth provision/Youth club within the parish.
- Need for new parks for dogs and children.
- If Stoneham's farm is not viable as it is the owners could considered a diversification into a leisure activity.
- The site falls within the definition of Green Infrastructure and therefore, development would be detrimental to the policy as the provision could not be re-provided elsewhere.

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. Development of the site will not impact on any formal recreation or leisure facilities (the site is not adjacent to the Cornwell Centre/recreation ground), the rights of way across and adjacent to the site will be retained, with this requirement being set out in the detailed policy for the site. Therefore, legal access to the open countryside and Sulham Woods would be retained, both for existing residents, new residents and those travelling into the area. Landscape buffers and areas of public open space,

including a play area, are proposed in the indicative framework plan for the site. Details of these would be set out as part of a planning application

There is no commitment or provision of a swimming pool in the Core Strategy. There are a number of leisure facilities in the local area, although it is acknowledged that some of these are within Reading rather than West Berkshire. The nearest swimming pool to the site is Meadway Sports Centre approx 3km from the site. The 'Your Reading Passport' which gives discounts at Reading leisure facilities, is not available for those living outside Reading. West Berkshire Council offers the 'West Berkshire Card', which offers discounts at leisure facilities within West Berkshire.

The site could be defined as green infrastructure under the 'Natural and semi-natural green spaces' definition. Development on the site would need to meet the requirements of the Green Infrastructure policy (CS18) of the Core Strategy). Stoneham's Farm has been submitted to the Council as a site for residential development. There may be potential for some leisure facilities and outdoor provision for young people to be incorporated into the green infrastructure/public open space that would need to be provided on the site should it be developed.

Utilities

Consultation comments:

- Sewage facilities
- Water supply – pressure is low
- Thames Water have made improvements to water supply, but this did not take into account additional housing
- Already issues of fly-tipping in the area
- Consideration of addition waste and recycling collection/facilities needs to be considered

Council response:

The site promoter has carried out a utilities assessment to assess the feasibility of providing the proposed development with all necessary utilities. The assessment concludes that there are all utilities close to the site, and that there should be no issues connecting the site to the necessary utilities, recognising that connection to utilities infrastructure would be subject to approval and available capacity within local networks.

Consultation has taken place with Thames Water. They have indicated that, with regard to EUA008, improvements to infrastructure are likely to be required. A water supply strategy and drainage strategy would be required as part of any planning

application should the site be allocated. This would be included as a policy requirement. No concerns have been raised regarding EUA003.

Consultation has taken place with National Grid, however no concerns have been raised regarding power supplies in the area.

The Council has a duty to supply waste disposal services, and these services would be extended to any new developments. The Council is in the process of developing a Minerals and Waste Local Plan, which will look at the provision of new waste disposal facilities if, and where, these are required.

Emergency services

Consultation comments:

- Relocation of the Fire and Rescue HQ to Pincents Lane – requires good access to the M4/A4

Council response:

The relocation of the Fire and Rescue service HQ to Pincents Lane has already taken place. The fire station itself remains at Dee Road, until an alternative location can be found.

Retail

Consultation comments:

- Distance from local centres with commercial facilities such as shops, post offices, leisure centres (2/3km to Tilehurst Triangle / Overdown Road Local Centre)
- Waitrose is the only supermarket in the area which is too small to support the local community
- Access to Sainsbury's at Calcot will be difficult should Pincents Hill be approved

Council Response

It is recognised that there is no town centre in Tilehurst, however, there are a number of local shopping areas within 1.5km of the site.

13. Landscape/Setting

Setting and character

Consultation comments:

- Loss of tranquillity
- Loss of sky views
- Change in character of the area – loss of rural character
- Lack of green spaces
- The area around Tilehurst is considered or assumed to be a natural greenbelt and is valued for its rural, countryside pastimes and recreation
- Loss of views

Council response:

A Landscape Assessment has been carried out for the site. This indicates that part of the site would be suitable for development subject to certain mitigation measures to reduce the potential impact on the AONB. Where a site was assessed as causing harm to the AONB it has not been included within the Preferred Options DPD.

West Berkshire does not have any designated Green Belt land.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD.

AONB

Consultation Comments:

- Within the AONB.
- Only 15 % of land in England is AONB.
- Development in the AONB should enhance life, not result in a detrimental effect on existing residents.
- Development would result in harm to the natural beauty and special qualities of the AONB.
- Loss of green buffer between AONB and existing residential development.
- Visual impacts on the AONB as sites are on elevated ground.
- Light pollution in the AONB.
- Development would not conserve and enhance the special qualities and natural beauty of the AONB and is therefore, against the Core Strategy.
- The site provides a physical connection between the AONB and urban development.
- The LCA was carried out after the site had been treated with weed killer and ploughed (the field has previously been used for crops) this made the field look as if it was poor quality.
- There are 8 other LAs circling the AONB, each asking for 100 – 1500 homes, at this rate there will be no AONB left .

- Disagree with the LCA that development could be accommodated
 - Historic assets have been undervalued – this sort of settlement is rare in Tilehurst.
 - Screening of the site from Long Lane would need to be removed to allow access, road widening, lighting and footpath construction.
 - Impacts on footpath views are undervalued.
 - It is missing an understanding that the fields between existing settlement and the AONB are already GI.

Council response:

The protection of the special landscape character of the AONB is paramount. As such The Council has carried out a Landscape Character Assessment for all sites adjacent to or within the AONB. The LCA indicates that part of this site is suitable for development, and subject to the mitigation measures set out in the report development will not cause harm to the special qualities and character of the AONB. The site has been assessed as arable agricultural land, and as such it is not uncommon for a site to be ploughed at various points throughout the year.

The Council's Landscape Character Assessment takes into account the historic significance of the site and a Historic Environment Assessment has been submitted by the site promoters for EUA008. This assessment has been reviewed by the Council's Archaeology team. They have confirm that the impact on Purley Hall Registered Park and Garden is likely to be low, but they do ask that further consideration is given to the archaeological potential within the site, recommending an archaeological field evaluation takes place on EUA008 and archaeological recording take place on EUA003, secured by planning condition if the site is given planning permission. The assessment has not fully considered the fact that Stonehams Farm is a historic farmstead with origins at least as far back as the 18th century, with some pre 18th century fields to the south and possible medieval earth works to the north indicating the farmstead could be older. Further investigations, as set out above, will determine the historical significance of the farmstead. Details requiring this additional archaeological work will be included within the site specific policy for the site.

Topography

Consultation comments:

- Overshadowing of existing residential areas
- One of the highest areas around Tilehurst

Council response:

The topography of the site has been taken into account in the Council's Landscape Character Assessment. Any development would need to take into account the scale and character of existing residential development when considering design.

14. Personal

Consultation comments:

- Impact on health, wellbeing and quality of life of existing residents
- Attraction of area

Council response:

New development itself is unlikely to impact on health and wellbeing.

All new development will be required to be designed to reflect the character of the existing residential areas; therefore, there should be no impact on the attraction of the area.

15. Pollution

Consultation comments:

- Climate Change
- Light pollution leading to a reduction of views of the night sky and impact on ecology
- Air quality reduction as a result of additional traffic
- Noise pollution as a result of additional traffic
- Impact on water quality

Council response:

All development is expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 of the Core Strategy.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of

light pollution. The Ecological Assessment submitted by the Site Promoter for EUA008 highlights the potential impacts of light pollution on wildlife and sets out recommendations for careful planning of lighting during construction and as part of the development design.

It is unlikely that development of the site will have a significant impact on noise pollution levels. Noise mitigation measures are being installed along the A4 as part of the widening works, which should reduce the noise impact from the road.

16. Settlement boundary

Consultation Comments:

- Breaching settlement boundary
- Once the boundary has been successfully challenged by developers there is no reason more development outside the boundary will come forward.
- Objection to any changes in the settlement boundary.
- Should protect residents from over population and protect small areas of green space that are left within the parish.
- Acts to protect the AONB from intrusive development.
- No natural boundary to prevent future development on the site .

Council Response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

17. Comments from the site promoter (EUA008)

- The site is under option to a Horstonbridge Thames Valley Limited
- Darcliffe Homes would seek a bespoke development which seeks to protect the assets of the site and the wider area, whilst making best use of the available land
- The land owner is willing in principle to work with the land owner of EUA003 to deliver a comprehensively designed scheme. Alternatively the site can be brought forward independently
- *Development potential*

- The site is identified for low density development (44 dwellings). Would like to see the site developed for about 80 dwellings
 - 20 dph is considered very low density and a range of between 30 and 40 dph is considered more appropriate given the location of the site
 - Surrounding developments are all in excess of 20 dph
- Indicative plans have been provided, showing a development area of 2.5ha accommodating about 80 dwellings at 32dph.
- A Landscape and Visual Impact Assessment has been prepared
 - The site is physically and visually open on its north-western boundary, with no defining edge from the open countryside. However, it is considered to be closely related to the built form of Tilehurst
 - The site is not visible from areas to the north due to intervening built form, wooded hills and topographical variation. There is a small area visible on the north-western boundary extending over a distance of approx. 500m
 - The requirement for a wooded buffer to the open countryside is considered excessive given the limited views into and out of the site – further consideration regarding the boundary treatment is required
 - The developable area on the Council's map does not coincide with the 90m contour line suggested in the report
 - Treatment of the north western boundary and the scale of planting can most appropriately be determined at the planning application stage, therefore, the whole site should be allocated
- The PO document indicates access from Long Lane with a requirement to undertake road widening and footpath provision
- TA (based on 80 dwellings) submitted demonstrates that the site can be safely accessed from Long Lane and does not identify a need for widening
- A single access onto Long Lane will be provided at a point halfway between the 2 mature trees adjacent to the southern boundary of the site
- Appropriate visibility splays can be provided
- The carriageway to the front of the site is approx. 5.5m wide sufficient for 2 HGVs to successfully pass. Therefore, widening is not required. Without this requirement the site can be delivered in the short/medium term
- A pedestrian footway would be provided linking the site to the existing footway near the Long Lane/Dark Lane roundabout - footpath to be provided within the site boundary to allow the retention of existing vegetation, this would negate the need to widen Long Lane
- An extended Phase 1 habitat survey has been carried out.
- The site comprises arable land which is actively farmed, therefore is of little ecological value
- The principle features are trees, hedgerows and verges particularly to the north eastern and south eastern boundaries
- Trees and hedgerows will be retained where possible

- New planting will seek to maintain and enhance the existing ecological value of the site providing appropriate linkages and corridors to the LWS
- An assessment of the Historic environment has been carried out
- Identification of 20th Century pheasantry and small barn, and 20th Century dwellings – these assets are considered to be of negligible heritage significance and would not constrain development
- While there could be potential to impact on the setting of Purley Hall the site is not within the former extent of the parkland. The immediate setting would not be altered and the experience of viewing the surrounding countryside from the park would be largely unaltered. Any impact would be negligible, and the overall impact would be minor

Mineral extraction

- The site is not within a preferred area for Mineral Extraction.
- The site is in the AONB, where there is a strong presumption against mineral extraction
- The proximity to residential development would mean significant buffers would be required which would reduce the scale of potential extraction making it uneconomical
- Therefore, it is considered that gravel extraction on the site would not be supported

Suggested Changes

- The development boundary for the site includes the area of GI identified in the LCA, making it clear that buffering/screening will be required to the north west boundary - The planning application is considered the most appropriate time to determine the relationship between the proposed development, landscaping and the AONB
- The allocation should be increased from 44 dwellings to about 80, giving a density of between 30 and 40dph.
- The widening of Long Lane should not be a requirement of the development

Council response:

All sites within the AONB have been given a lower general density to respect the special character of the landscape. The density of surrounding developments ranges from approximately 14dph at Barbara's Meadow and Conifer Drive, to 27dph at Highworth Way/The Knoll, therefore, a density of less than 30dph would be appropriate on this site.

The revised settlement boundary will go around the developable area of the site.

Due to the site's location within the AONB the character of the area needs to be respected. The surrounding areas have a density of less than 30dph

The density of surrounding developments ranges from approximately 14dph at Barbara's Meadow and Conifer Drive, to 27dph at Highworth Way/The Knoll. The council have used a standard density of 20dph for all sites within the AONB, however, a density between 20 and 30dph may be appropriate in this location. It is unlikely, that given the location in the AONB, that a density of more than 30dph would be acceptable.

The Council's Highways Development Control team require the widening of Long Lane from the junction with Vicarage Wood Way to the junction with Sulham Hill to 5.5m. Some consideration will be given to narrowings with one way working when appropriate to protect key trees. Improvements to the sight lines at the Sulham Hill/Long Lane Junction are also required to accommodate any additional traffic. Without these improvements development of the site would be unacceptable from a highways authority point of view.

The site is not within a preferred area for mineral extraction; however, the western part of the site is within a mineral consultation area. The site is underlain with gravel, which gives the potential for use or extraction prior to development of the site, which needs to be considered prior to development of the site in line with policies 1 & 2 of the Replacement Minerals Local Plan. It may be that it is not appropriate to extract the gravel, but consideration needs to be given to the potential.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA031: Land to the east of Sulham Hill

Total responses received: 1292

Template responses received: 902 (70%) – 7 individual templates were used:

- EUA003 008 031 033 template (1)
- EUA003 008 031 033 template (2)
- EUA003 008 031 033 template (3)
- EUA007 003 008 031 033 template (1)
- EUA007 003 008 031 033 template (2)
- EUA007 template (1)
- EUA007 template (2)

A petition objecting to the development of EUA007, EUA008 and EUA003, EUA031, EUA033 with 2,218 signatures was submitted to the Council.

1. General

Consultation comments:

- Developers should buy private land to build on, this is nothing but a money making scheme from the Council to generate some funds
- Reasons EUA032 dismissed are the same here
- Significant local opposition from local residents, and those living further away who use the local amenities
- No reason for such devastation of this area
- No valid reason for development on this site
- Development of such a small field would be unethical and would fail to demonstrate any regard or respect for local residents
- No regard for the environment
- In combination effects of all sites in the area should be considered
- Beneficiaries of the development – developer, landowner, property investors. Local people do not benefit
- Object to planning application
- Development merely help fulfil government/local government targets with scant regard for the local environment or community
- Unknown impact of IKEA on the area
- Consider legal action over proposals if approved
- Loss of value for properties
- Local Councillors should conserve and protect the environment
- For localism and parish plans to retain any credibility WBC need to take heed of the concerns and reconsider all the sites in the EUA

Council response:

The site is in private ownership and being promoted on behalf of the landowner for development through the Council's Strategic Housing Land Availability Assessment (SHLAA).

EUA032 was rejected largely due to its poorer relationship to the existing settlement pattern, issues over access and the proximity to ancient woodland to either side of the site. While all the sites in the Eastern Area have some issues in common, with EUA032 the combination of issues on the site meant that it was not taken forward as a preferred option.

The level of local opposition is noted. However, the Council is required to deliver new development to meet the housing need set out in the Core Strategy. The Council have considered all sites submitted to them for inclusion in the SHLAA and put forward the most suitable sites as preferred options for allocation.

The cumulative impact of all the sites in the Eastern Urban area has been considered as part of the Council's Landscape Assessment and through other parts of the evidence base including the Transport Assessment. The updated Infrastructure Delivery Plan will also consider the in-combination effects of development.

Development of any site will lead to some financial benefit for the landowner and site developer. All developments are required to provide financial contributions, in terms of the Community Infrastructure Levy (CIL) to help to mitigate the impact of development on the local environment, community and infrastructure. Therefore, development does bring some benefits to existing local residents in terms of improved services and facilities.

At this stage the sites being considered are being considered, in principle, for allocation, they are not being assessed as planning applications. All sites that are allocated for development will be required to seek and gain planning permission before development can take place.

The Council are required to undertake assessment to consider the impact of development on sustainability through the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process. This considers the impact of development on environmental, social and economic factors and where a significant negative impact is shown a site has not been recommended for allocation. Development can bring benefits in turn through improvements to services and facilities through developer contributions (CIL) which are available to both new residents and existing ones.

It is acknowledged that there are some unknowns regarding the impact of IKEA when implemented. A Transport Assessment was submitted alongside the planning application for IKEA. This was considered acceptable by the Council, subject to the mitigation measures to be provided. The details from this TA have been included in the Council's Housing Site Allocations DPD Transport Assessment work; therefore, the traffic impact from IKEA has been taken into account.

One of the government's aims in building more housing is to improve affordability of new houses. The impact on existing property values is not a consideration of the planning process.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The Inspector will consider all comments submitted through the plan making process. The Council will not submit the plan to the Secretary of State for examination unless it considers that the plan is sound and meets the tests above, and with Duty to Cooperate, legal and procedural requirements have been met.

All sites within the DPD have been subject to SA/SEA, and only those sites with no significant negative impacts have been taken forward. In many cases potential negative impacts can be mitigated against.

This early stage of consultation is the opportunity for local people to voice their views on the location of future development. The Core Strategy sets out the spatial strategy for development, and the Housing Site Allocations DPD is looking to allocate the remaining housing requirement from the Core Strategy. The Council will take into account the views of local residents as submitted through the consultation process.

2. Principle of development

Consultation comments:

- Feels as if development is being dumped away from Newbury – decisions are being made for Reading
- Clements Mead development is large enough already and should not be extended
- Tilehurst Parish should be marked as ‘No new house building permitted all areas for house building have been used’.
- Development of this site is a tiny amount of the overall number required/ will make little impact on the housing requirements of the nation or area
- The area has had enough development in recent years
- Already had several areas nearby since 1999 for residential purposes but with little green space
- Development is not viable or sustainable
- Will lobby local MPs for major changes to town planning, to build upwards rather than sprawling into the countryside
- Lots of fields have already been used for development (Menpes Rd, Devonshire Gdns, Prince William Dr, The Knoll)
- Precedent for future development into the fields west of Sulham Hill
- Building is taking place constantly along Long Lane. There is planning permission for homes next to the Roebuck on Purley Rise and proposals for 58 houses on Purley Rise opposite the Roebuck
- Risk becoming part of Reading
- Increased land value for land being considered for development (agricultural land = £7000, development land = £700,000)
- Least contentious site of the proposals
- Previous appeal at Pincents Hill (EUA007) – the same reasons for refusal at the time still stand (transport, infrastructure, landscape, closure of the strategic gap between Reading and Theale)

Council response:

The Council’s Core Strategy sets out the Council’s housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial strategy for the distribution of development across West Berkshire, including within the Eastern Spatial Area. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Urban Area would be able to take the amount of development proposed. The Core Strategy was adopted following the publication of the NPPF.

The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or the distribution.

Reading Borough Council was consulted on the Core Strategy, and is therefore aware of the housing requirements for the Eastern Urban Area. This part of West Berkshire has a close functional relationship with Reading, and West Berkshire Council will continue to work in partnership with Reading to address cross boundary issues and requirements through the Duty to Cooperate.

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified based on a range of factors, including sustainability and number of services and facilities available.

Area Delivery Plan Policy 4 sets out that sites will be allocated to fulfil the requirements of the Core Strategy, including some on greenfield land.

The sites set out in the Preferred Options DPD are based upon sites promoted to the Council through the Strategic Housing Land Availability Assessment (SHLAA). The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While there may be other sites, these may not be available, e.g. they may not have been submitted to the Council through the SHLAA (e.g. the prudential site between J11 and J12 of the M4) or are not in accordance with the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

The housing type and mix of any development needs to comply with policy CS4 of the Core Strategy, having regard for the character of the surrounding area.

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis. The assessment of this site did not result in any significant impacts on sustainability.

Only part of the site will be allocated for development, in line with the area indicated in the Council's Landscape Assessment, therefore, development will not join up with the Berkshire Circular Route footpath which crosses the site. The revised settlement boundary will go around the developable area of the site and will redefine the 'settlement' area and protect those areas outside the new boundary from development.

The cumulative impact of all the sites in the Eastern Urban area has been considered as part of the Council's Landscape Assessment.

The previous application at Pincents Hill was submitted as a speculative planning application and in principle was against planning policy. Therefore, the Council had an in principle objection to the site. The site promoters have put forward a

considerably smaller scheme which aims to respond to and address the concerns raised at the appeal, in particular landscape objections, and protect the majority of the site in perpetuity. This revised scheme is being considered through the plan led system, and therefore, if the site was to be allocated for development the principle of development on the site would be established as acceptable.

Loss of views from existing properties is not a planning issue and therefore, there is no requirement to compensate property owners for any change to the view from their property.

Housing numbers

Consultation comments:

- Number of dwellings on the site could increase without residents being informed
- This is just a tick box and numbers process
- Understand more housing is required, but not sure why
- The regional tier of government setting housing requirements has now been abolished, so questioning whether the need still remains if specific housing numbers no longer need to be met
- The DPD identifies 2,088 dwellings – 622 more than required to meet the 10,500 dwellings in the Core Strategy. It is assumed that not all sites, and possibly none of the sites in the EUA would be needed to deliver sustainable strategic growth in West Berks.
- Of the 1,400 identified for development in the EUA, 283 have been delivered, and another 427 secured in planning terms, leaving 690 units to be delivered elsewhere. It is understood that these could be delivered elsewhere in the West Berks area
- Is the loss of countryside worth it for 30 dwellings?
- The site only makes up 0.2% of West Berkshire's new housing target, and only 2% of the target for the EUA – it will have little impact on the Council's ability to deliver, but will have a significant impact on the area
- The Council should not bow to the Government's demands for additional housing, and should instead put pressure on them to put investment into area of the country that actually need it

Council response:

The housing requirements for each spatial area of the Core Strategy have been subject to independent examination, which concluded that based on the evidence provided the Eastern Spatial Area would be able to take the amount of development proposed.

The Preferred Options DPD did set out a number of options for sites within the Eastern Spatial Area, from which the most suitable would be allocated following the consultation. Enough sites need to be allocated within the EUA to provide a degree of flexibility within the Council's housing requirement.

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement of approximately 1,000 dwellings. In comparison the Eastern Urban Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings.

Planning Policy

Consultation comments:

- Against the NPPF:
 - Chapter 8 para 72 - insufficient schools in the area, funding cannot come from S106. Where S106 has been used in the past, no benefits are ever seen
 - Chapter 8 para 73 - loss of open space of public value
 - Chapter 8 para 74 - list of criteria for losing open space cannot be met for this site
 - Chapter 8 para 76 - The opportunity for the sites to be given special protection as Local Green Space has not been given
 - Chapter 8 para 77 & chapter 9 para 80 protections of the Green Belt
 - Chapter 11 para 115 - allocation of site is contradictory to great weight and highest status of protection required for AONBs
 - Chapter 11, para 118 and 123 - no protection of areas of tranquillity which are prized for their recreational and amenity value. The LPA must do something to make up for drastic measure of developing on green spaces. See no compensatory measures for the people in Tilehurst at the loss of so much valued green space
- Against Core Strategy policies:
 - CS17 - no enhancement of biodiversity/geodiversity
 - CS18 - loss of GI, without opportunity for more of equal or greater size to be provided as replacement
 - CS1 - location of new houses is not in line with policy
 - CS14 - does not preserve the character of the area
 - CS13 - impact on road safety and the need for infrastructure improvements

Council response:

The NPPF states that the development plan, in this case the Core Strategy, is the starting point for decision making. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF aims to proactively drive and support sustainable economic development to deliver homes and businesses, and requires Local Authorities to identify and meet their housing need, taking account of market signals and setting out a clear strategy for allocating sufficient land for development.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

The requirement for the allocation of sites, including Greenfield sites, for development is set out in the Core Strategy. All allocated sites will be required to comply with the policies of the Core Strategy.

Consideration of the local character of an area is a crucial factor in site design.

Areas of landscaping, buffers and public open space, including a play area are proposed for the site (as set out in the indicative framework plan).

A travel plan would be required to accompany a planning application for the site; this would set out a number of measures to encourage new residents to consider walking, cycling and other alternatives to use of the car for everyday journeys.

Land Use

Consultation comments:

- Greenfield site
- Try to fill in small areas of land not built on
- There are sufficient brownfield sites for 10 years of development before Greenfield development is required
- Concentrate on development of brownfield sites
 - Sites along the A4 have not been considered, but were in the SHLAA assessment – they sites are more acceptable than Greenfield sites.
 - Horncastle Ford
 - Closed Pub along A4
 - Can a comprehensive list of brownfield land be provided with justification for any rejections

Council response:

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Alternative locations

Consultation comments:

- More development should take place around Newbury, Thatcham and Hungerford
- Use of the IKEA site
- Horncastle pub and car showroom are suitable
- Regeneration of Oxford Road
- Use of unused industrial/commercial buildings in Tilehurst
- Many less populated areas in the district which could be developed
- Complete new village to site houses, school, doctors and dentist
- Redevelopment of areas closer to town centre of Reading
- Thatcham – better infrastructure/amenities and is closer to Newbury – majority of sites rejected despite a lack of opposition
- Development in Newbury & Thatcham would not result in the same level of harm because of investment in infrastructure and employment that will go along side the growth
- Consider sites with a smaller impact on local residents
- South Lakeside has not been identified in the DPD – the LA should proactively investigate what can be achieved on this site
- The council should encourage developers to provide innovative/creative solutions to build on or near the large number of lakes that characterise former gravel workings
- Review of employment sites is needed as there is sufficient waste land and empty offices in Newbury that could be used to meet the housing numbers required – this issue should be resolved before considering greenfield development
- Why has London Road Industrial Estate (300 dwellings) has not been included?
- Greenham/Crookham Common
- The area bounded by Beech Road, Goosecroft Lane, Sherwood Rise and Long Lane Primary School

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites put forward to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the settlement hierarchy. While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing. A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

3. Coalescence of settlements

Consultation comments:

- Loss/reduction of the strategic gap
- Strategic gap makes it inconceivable that development would take place
- Loss of the separate identity between the settlements (Calcot/Theale, Tilehurst/Pangbourne)

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will

therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

4. Consultation

Consultation comments:

- Why were letters only sent to those within 100 yards of the proposed sites when the impacts would affect a much wider swathe of residents in the area
- Consultation has been highly dubious – The Council seems set on trying to push this through by allowing insufficient time for local residents to formally review and response.
- First notified by Parish Council of meetings in mid August being held within a week of the notification
- Notification of the consultation was delivered in a blank white envelope with no marks to identify that it was from the LA – communication needs to be reviewed and consideration given to whether it was fair and run to the best of the Council's ability.

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination, together with the comments that have been made.

5. Crime and Security

Consultation comments:

- Increases in population and density resulting in higher crime rates, in particular anti-social behaviour
- Recreation ground already brings anti-social complaints with groups gathering in the evening
- Issues of fly tipping
- Policing comes from Newbury, and we have had to wait over an hour for the police to attend in the past
- Anti social behaviour due to a lack of open spaces and increasing density of housing
- A local bench has had to be removed due to anti-social behaviour
- Issues of drug abuse happening in the recreation ground

Council response:

All development will be designed to create safe environments, addressing crime prevention and community safety.

6. Design

Consultation comments:

- Development will not be able to replicate the existing open front gardens of the Clements Mead estate – rear gardens are likely to back onto the recreation ground (for security reasons) and Clements Mead Road (due to topography, loss of trees) – this would result in enclosing new residents in a cul-de-sac not integrating into the existing estate
- The density of development would not be in line with existing developments
- 3 storey buildings out be out of keeping and tower over existing 1-2 storey dwellings

Council response:

Development will need to comply with the policies of the Core Strategy, and be in line with the Council's quality design guidance and Manual for Streets. All development will need to take into account the character of the area, including the height of existing dwellings.

The density given for the site is based on a generic density used across all sites. The final density of the site will be subject to negotiation with the site promoter, and take into account the density of the surrounding development. Clements Mead is built to a density of approximately 34dph.

Detailed design and site layout is a matter to be discussed at the planning application stage, however it would be appropriate for the development to face in to Clements Mead to enable proper integration with the existing built form.

7. Ecology

Consultation comments:

- Destruction of wildlife habitats and wildlife corridor for a range of species (birds, bats, badgers, deer, foxes, small mammals, reptiles, insects, slow worms, bees)
- Removal of vegetation to provide adequate access / highway improvements
- Loss of agricultural land/grazing land
- Pressure on nearby woodlands (inc. ancient woodland) trees (inc. those protected by TPOs) and hedgerows
- Disturbance due to trampling, litter, fly tipping
- Impact on Sulham Woods
- Footpath erosion/poor maintenance making paths inaccessible in winter
- Impact on woodland flowers (bluebells, foxgloves)
- Impact of introducing domestic animals (cats) into the woodland area
- Increase footfall through woodlands
- Loss of trees
- Potential for newts on the site
- 60% of species are in decline
- Badgers often cross Long Lane
- Historic Oak on the pavement on Long Lane, next to Cecil Aldin Dr – impact of traffic/lorries
- Sulham woods SSSI – legislation protects the interest feature from development and other damage, including neglect
- Impact of pets
- Reports of breeding colonies of Great Crested Newts on or in the vicinity of the site - this needs to be investigated – if it is true development would not be able to take place
- Impact on protected species
- Impact on Moor Copse SSSI

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options. Ecological survey work has been carried out by the site promoters these set out a number of recommendations to limit, and reduce the impact on ecology. The Council's ecologist is content that, subject to the mitigation measures set out in the

Ecological survey, there will not be a detrimental impact on ecology. Details of the measures required will be included within the site policy.

Trees protected by TPOs can be removed, with prior approval from the Council, usually permission is approved subject to alternative planting being provided on the site.

Further Ecological Assessment would be required to accompany any planning application for the site.

Natural England has asked that consideration is given to the potential impacts on recreational disturbance and pressure on the Sulham and Tidmarsh Woods and Meadows SSSI. Good design and adequate buffers and education of new residents should ensure there is no significant impact.

8. Employment

Consultation comments:

- Loss of farm which will lead to a loss of employment
- Impact on Hall Farm Equestrian Centre due to loss of grazing land. Potential to reduce capacity for events, impacting on accreditation with riding clubs which would impact on the viability of the business.
- Reluctance of people to livery horses if access to the fields is lost
- Loss of opportunities for riding for the disabled and girls who are under-represented by sport facilities in the area
- Little land left for horse riders
- The field is currently used
- Increased traffic levels will impact on how quickly drivers are able to access business premises which would impact on levels of service for clients

Council response:

The lease agreement between the landowner and the stables means that should any land, currently used by the stables, become unavailable, a suitable alternative will be provided. It is likely that this land would be provided on the same side of Sulham Hill as the stables, therefore, improving the road safety situation for horses and riders who currently have to cross Sulham Hill to reach the site.

No comments have been received from the Stables, therefore, it is assumed that development of the site would not have a Significant impact on the viability of the business.

9. Flood risk

Consultation comments:

- Localised flooding is a significant issue. Long Lane is often closed in winter due to flooding.
- Identification of surface water flood risk areas
- Groundwater emergence zones
- Water seepage from the sites is common
- Clements Mead does not have a flood risk, would have a heightened risk of flooding as the water has to go somewhere and existing properties are lower than the site
- The field floods and gets muddy in winter
- The site is a valuable soak away which will be lost by building on the site
- Completion of Denefield Gardens have increased water runoff in the area
- Water pours off the field into Clements Mead after heavy rain
- Ancient springs
- However well designed SUDs are green spaces are always better than hard standings for absorbing water and reducing flood risk

Council response:

Flood risk on the site is low. The site promoter has provided a Flood Risk Assessment for the site. This has been reviewed by the Council's flooding team. Sustainable Drainage Systems (SUDs) are to be provided which will reduce the risk of surface water flooding. The issue of flooding on Long Lane is noted.

10. Highways and transport

Consultation comments:

- Reliance on car travel
- Distance from local centres will result in increased traffic levels
- No consideration of planning for roads
- The proposals do not comply with CS13 – they will not help to reduce the need to travel
- Any mitigation measures would need to be agreed by Reading, who may not agree

Highway Network/Traffic

Consultation comments:

- Individually the sites may not have a detrimental impact on traffic, but cumulatively they are likely to result in increased congestion in the area

- A large number of houses have already been build within a mile of the site (towards Oxford Road, by Reading BC) and has impacted on congestion at Sulham Hill/Mill Lane
- Congestion and traffic disruptions
- Smart Motorway/M4 hard shoulder running already being proposed
- Traffic impact on Clements Mead/Chapel Hill
- Traffic impact on Sulham Hill, Sulham Lane, Chapel Hill, City Road, Park Lane, School Road, Langley Hill, M4, Prince William Dr, Trelawney Dr, Overdown Road, Tring Road, Fairford Road, Mill Lane
- Construction traffic will cause further disruption
- 29 houses could result in 60 cars using Clements Mead/Chapel Hill
- Road maintenance delayed due to financial restraints
- Impact on IKEA on local roads
- Over 1000 cars use Long Lane each way on a daily basis. Vans and Lorries also use the route
- Regular near misses occur at the junction of Long Lane and Sulham Hill – this is a dangerous single track route with passing places
- Appear to be no attempts by WBC or RBC to address the concerns of residents regarding increased traffic volumes
- Traffic calming has already been installed to deal with traffic issues, and is not always effective
- Langley Hill the only route from this site to the M4, already subject to long queues. Leading to country roads being used as rat runs
- Levels of traffic and traffic speeds are a serious concern for local residents within the parish and in neighbouring parishes
- Rush hour traffic, especially at school start/finish times, makes the area very congested
- Any increase in Lorry movements would have a big impact on Chapel Hill, Sulham Hill and Long Lane
- Increase in home delivery vehicles
- Speeding traffic is already an issue on residential roads
- Opening up Pincents Hill to the north would put an even greater strain on the road system drawing traffic from Pangbourne and West Reading
- Traffic impact on to Reading's roads will require mitigation
- Local roads are used as rat runs

Council response:

Development of the preferred options sites would have on the highway network. The Transport Assessments (TAs) indicate that development of the sites themselves are unlikely to have a significant impact on the highway network, meaning there will be a limited impact on local congestion.

The site promoter has also submitted a Transport Statement (TS) for the site, which considered the impact on all the local road junctions around the site. The TS has been independently reviewed, and it shows that development of the site will not cause a significant impact on local roads or junctions. The Council's Highways Development Control Team is generally happy with the TS submitted. Highways improvements to Long Lane and the Long Lane/Sulham Hill junction are not required for development on this site to take place, although they may be required if EUA008/033 were to be allocated.

A Transport Statement would be required to accompany a planning application for the site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car.

The improvements to the A4, and the proposed Smart Motorway scheme for the M4 aim to improve traffic flow and journey time reliability. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth.

Access

Consultation comments:

- Too many houses for existing access roads
- Access via Clements Mead will add more traffic to already high volumes to Little Heath Rd/Chapel Hill
- Access is on a nasty corner on a bend
- The proposed entrance to the site is in conflict with Home Croft which carries traffic for the Cornwell Centre
- Access on to Clements Mead in relation to existing driveways
- Access onto Chapel Hill/Little Heath Road would not be suitable
- Access would require significant improvements to the highway and footpath network which would change the character and topography of this rural area
- If all sites developed would result in 3 entrance roads within 100m of each other
- With 3 sites having access onto Long Lane there will be an increase of 35% in daily traffic flow (current traffic on Long Lane about 1300 vehicles a day)
- Various local traffic counts carried out in the local area

Council response:

The site promoter has indicated that adequate access, with suitable visibility splays can be provided, between the two existing mature trees fronting the site. Some limited vegetation removal may need to take place, but this would not include the removal of these mature trees. This access is considered acceptable.

Traffic surveys have been carried out as part of the Site Promoter's TS, these have been verified by the Council.

Public Transport

Consultation comments:

- No joined up Public Transport Strategy
- *Bus services*
 - Limited public transport services – 2 bus services No. 16 and 33 (1km to bus stops). Service 33 being reduced (Sept 2014)
 - No direct bus service from Long Lane to the village
 - Only 4 buses a day (route 28) serving Tilehurst Village directly meaning a reliance on car use
 - Newbury-Tilehurst Bus fares have just gone up due to reduced funding from WBC
 - No bus stops in close vicinity to the sites
 - Newbury is not accessible from Tilehurst by public transport
 - Buses have to sit in the same traffic as everyone else
 - More funding required to provide direct routes for passengers and more frequent services
 - Increased demand for Reading Buses services – mitigation may be required
- *Train Services*
 - Remote from limited public transport services (2.5km to Tilehurst railway station)
 - Expense of trains, do not go at times required
 - Lack of parking at Tilehurst Station
 - Too far from the station to encourage use of public transport leading to a reliance on the car
 - Tilehurst Station is within Reading not WB

Council response:

There are regular public transport services throughout the Eastern Urban Area, provided by Reading Buses, with a number of bus stops within half a mile of the site. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application. These sites are approximately 2.5km from Tilehurst Railway Station, this is just over the CIHT's "acceptable walking distances" for commuting or travel to school, which is set at 2km (CIHT, 2000), however, it is within cycling distance.

It is noted that there is a need for additional car and cycle parking at the station. The Council will work with Reading BC and First Great Western to determine what improvements would be possible.

Walking & Cycling

Consultation comments:

- No pedestrian access to the site
- No cycle paths in the immediate area, none provided within the West Berkshire area
- Virtually no alternative route for people crossing from the Purley, Little Heath or Tilehurst Triangle area
- No cycle facilities in the area (unable to cycle on majority of rights of way in the area)
- Topography does not encourage walking/cycling
- There are a number of ROW making this area very attractive for walking and cycling
- Lack of cycle parking spaces at Tilehurst Station

Council response:

Footpath links will be sought as part of any development of the site. There is potential for a crossing point on Chapel Hill could be reconsidered as part of any application coming forward for the site.

There is a provision of an on road signed cycle route from Little Heath School into Reading (R50).

Parking

Consultation comments:

- Overspill parking onto roads outside the development areas
- Road safety due to existing on-street parking
- Limited parking at local centres/facilities (Cornwell centre, local shops (Overdown Rd, Hildens Dr, Knowsley Rd))
- Parking for events at the riding stables will be lost
- Already parking issues within Clements Mead/Homecroft
- Use of Clements Mead for a car park for accessing local schools
- Lack of parking in new developments causing disruption and road safety issues (allowance for 1 – 1.5 cars per unit, not the 2-3 that most families own)

- Pavement parking takes place (against the law and inadequately policed) – issues for parents with pushchairs/wheelchair users
- Parking needed for people visiting the woods

Council response:

Previous parking policies to restrict the amount of parking provided at new developments have caused a number of issues in terms of overspill on street parking, and conversion of front gardens to parking spaces. As a result new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

Road Safety

Consultation comments:

- Additional traffic impact on road safety
- Road Safety for children walking to school/to the recreation ground
- Road Safety impact for Horses
- Road Safety crossing Little Heath Road is already a problem
- Risk of opening up Pincents Lane to the north – currently only quiet way for cyclists to go between Tilehurst and Theale
- Safe routes to school
- A dedicated pedestrian crossing should be provided on Chapel Hill
- Safety for cyclists along Sulham Hill is very poor – number of near misses and collisions

Council response:

Concerns over road safety are noted. Improvements are proposed, by the site promoter for the junction of Sulham Hill with Long Lane. There is also potential for improved crossing facilities at several junctions to improve road safety.

11. Infrastructure

Consultation comments:

- Local services (doctors/schools) already struggle to cope with current demand and are oversubscribed

- Dependence on services/facilities provided by Reading Borough Council
- Inadequate planning of infrastructure
- The Council has shown no interest in investing in amenities/leisure facilities for 15+ years
- Services/facilities in Reading cannot cope and people will not travel to Newbury/Thatcham
- EUA032 rejected, this site has the same issues
- The Council does not have the funds for the improvements required
- Sites not close to local centres, which provide community facilities such as shops, post offices, libraries, leisure centres etc.
- There is no recognised community 'centre' in Tilehurst
- Section 5.87 of the Core Strategy states that development should be located in areas where there is good access to key services and facilities – this site does not contribute to this
- Developer contributions will be inadequate to fund the required improvements

Council response:

Existing pressure on local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed, in partnership with service providers.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of any necessary additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Education

Consultation comments:

- Schools are oversubscribed
- Birch Copse would not be able to deal with an increase in pupils (originally built for 200 pupils, now has over 400)
- Need for investment in training new teachers/doctors
- An extra education facility is needed otherwise the Council is completely out of touch with the needs and rights of our community
- Local families are being denied places at local schools, meaning children have to be driven to school
- 40% pupils come from Reading – pushing Reading pupils out of WB schools will put major strain on the local community
- Declining education standards as schools are too big
- Little Heath having to build new buildings to support extra sixth form pupils following the change in government policy
- Denefield is reducing its intake in order to become a smaller school
- The proposed development could generate demand for 200-300 school places – which may require an additional 1 to 2 form entry school or expansion of an existing school
- Developer contributions do not allow for proactive planning for new facilities, they give insufficient time to create additional school places
- Little Heath school is in special measures having been Outstanding 5 years ago
- Lack of nursery/pre-school/early years provision – what there is, is at capacity

Council response:

Early consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Medical Services

Consultation comments:

- No doctors in immediate vicinity of the site
- Doctors surgery has closed in Reading, displacing all the patients
- Difficulties getting a doctor's appointment – often have to wait 2-3 week to see doctors
- Only 2 doctors surgeries in Tilehurst Catchment
- RBH is catering for twice the number of patients it was built to accommodate – waiting lists are already too long
- Pressure on dentists

- Poor mental health services – struggling to keep up with demand
- Difficulties in getting a doctor's appointment are resulting in more people visiting A&E or minor injuries at the hospitals

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP) in partnership with service providers.

Recreation/leisure

Consultation comments:

- Impact on Cornwell Centre
- Loss of access to open space/recreation facilities
 - Loss of area for dog walking
 - Will not be replaced elsewhere
 - Loss of opportunities for outdoor activities (e.g. blackberry picking)
- Lack of Leisure facilities
 - Cotswold is small and expensive
 - No swimming pool, which was promised a few decades ago
 - Library
 - Lack of play areas and football training facilities
 - No youth centre/youth provision/youth worker (only outdoor play equipment is the skate part at Little Heath Recreation Ground)
 - Inadequate sports facilities
 - Recreation ground in the parish provided & maintained by the Parish Council
- Lack of funding to maintain current common open or landscape spaces
- Bowling Alley lost for IKEA
- Residents do not benefit from Reading discounts for leisure services/facilities
- Potential for conflict between new residents and users of the recreation ground
- Issues relating to over-looking and child safeguarding for those using the recreation ground

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. Development of the site will not impact on any formal recreation or leisure facilities. There is no public access to the site, and development of the site would not have an impact on the Cornwell Centre or the recreation ground adjacent to the site. The recreation ground includes a play area and hard court basketball area.

Landscape buffers as set out in the Council's Landscape Assessment, and an area of public open space would be required in line with the Council's Core Strategy Policy CS19, would be required on the site.

There is no commitment or provision for a swimming pool in the Core Strategy. There are a number of leisure facilities in the local area, although it is acknowledged that some of these are within Reading rather than West Berkshire. The nearest swimming pool to the site is Meadway Sports Centre, less than 2.5km from the site. The 'Your Reading Passport, which gives discounts at Reading leisure facilities, is not available for those living outside Reading. West Berkshire Council offers the 'West Berkshire Card' which offers discounts at leisure facilities within West Berkshire.

It is recognised that the bowling alley was closed to make way for IKEA, however, there is nothing stopping a leisure provider making an application to provide a new facility elsewhere in the area.

Tilehurst Library is 1.5km from the site and the West Berkshire mobile library service visits a large number of locations in the Eastern Urban Area.

A landscape buffer to the recreation ground should prevent overlooking, however, some degree of overlooking can help to improve safety. Those choosing to live on the site would be aware of the location of the recreation ground prior to purchasing their property.

Utilities

Water/sewage

Consultation comments:

- Water supply/increased demand
- Sewage facilities
- Existing low water pressure

Energy

Consultation comments:

- Pressure on electric/gas services – in recent years there have been significant issues with electricity supply leading to power outages and disruption caused by improvement works

Waste/Recycling

Consultation comments:

- Waste collection vehicles currently reverse from Clements Mead into Home Croft as there is no turning circle. Any new development would need to be large enough to accommodate waste collection vehicles
- Refuse and Recycling collections will need to be considered as more houses would require additional collections

Council response:

The site promoter has carried out a utilities assessment to assess the feasibility of providing the proposed development with all necessary utilities. The assessment concludes that there are all utilities close to the site, and that there should be no issues connecting the site to the necessary utilities, recognising that connection to utilities infrastructure would be subject to approval and available capacity within local networks.

Thames Water has not raised any concerns regarding the water supply or waste water service in relation to development on this site.

Consultation has taken place with National Grid; however no concerns have been raised regarding power supplies in the area.

The Council has a duty to supply waste disposal services, and these services would be extended to any new developments. The Council is in the process of developing a Minerals and Waste Local Plan, which will look

Retail

Consultation comments:

- Local facilities at Tilehurst Triangle (in Reading) are village amenities, and insufficient to provide the needs for the existing community
- Distance from local centres with commercial facilities such as shops, post offices, leisure centres (2/3km to Tilehurst Triangle / Overdown Road Local Centre)
- Development of IKEA could impact on the future of Sainsbury's, Next, Boots and Dunelm.

Council response:

It is recognised that there is no town centre in Tilehurst, however, there are a number of local shopping areas within 1.5km of the site, including those at Tilehurst Triangle.

The impact of IKEA on the Calcot retail area is not yet known. It could, however, have a beneficial impact by attracting additional business.

12. Landscape/Setting

Consultation comments:

- Loss of tranquillity
- Loss of sky views
- Chosen to misname the proposed sites in the Green Belt as Eastern Urban Area

Council response:

West Berkshire does not have any designated Green Belt land.

Loss of views from existing properties is not a planning issue and therefore, there is no requirement to compensate property owners for any change to the view from their property.

Setting and Character

Consultation comments:

- Loss of access to open fields, recreation and leisure facilities
- Change in character of the area
- Few green spaces left in the area
- Loss of village character
- Offers sense of relief from an already overcrowded area
- The small greenbelt area adds to the charm of the area
- The site is effectively a park for residents to enjoy
- Loss of green space
- Change in character of Long Lane
- Against policy CS19 – development will extend the urban edge into the landscape
- Planning obligations SPD states the council will seek to ensure there is no overall loss to the environment and quality of life as a result of development
- Tilehurst does not have any special designations (listed buildings, heritage sites, national parks), but it is an example of an area highly valued by the local people

- It would seem that an urban edge, with a well defined settlement boundary and reinforced by the description in the Landscape Assessment would have developed a strong character and identity of its own, which is therefore, sensitive to change
- These fields are already providing Green Infrastructure, their loss cannot be replaced
- The loss of the remains of the historic settlement has been undervalued in the LSA
- Evidence of a large battle in the dark ages (Battle of Reading 871, King Alfred the Great) no consideration of the archaeological potential of the sites

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD.

The site promoter has submitted a Historic Environment Assessment for the site. This has been reviewed by the Council's Archaeology team and they have confirmed that there would be little impact on known heritage assets and that there is little archaeological potential in the developable area of the site and as such there have no issues regarding development on the site.

AONB

Consultation comments:

- Impact on adjacent AONB
- Development would result in harm to the natural beauty and special qualities of the AONB
- Light pollution in the AONB
- Loss of green buffer between AONB and existing residential development
- Proximity to AONB has been discounted by the Council – but the site should be retained as it creates a feeling of space and openness between existing development and the woods
- Environmental damage – destruction of natural beauty and biodiversity
- The Core Strategy places importance on conserving and enhancing ancient woodland areas adjacent to the AONB, as well as in the AONB. The proposal this site is contrary to this
- If all LPAs are asking for 1000 – 1500 homes in the NWD AONB there will be no AONB left
- LAs have a legal duty to protect AONBs
- Resent householder application refused due to proximity to AONB

Council response:

The Council's Landscape Character Assessment, carried out for all sites adjacent or within the AONB, indicates that development on this site, subject to the mitigation measures set out in the report, will not cause harm to the special qualities and character of the AONB. Where a site was assessed as causing harm to the AONB it has not been included within the Preferred Options DPD.

Topography

Consultation comments:

- Overshadowing/overlooking of existing residential areas/high prominence as site higher than surrounding residential area
- The site is 1 – 3m above the surrounding area

Council response:

Any development would need to take into account the scale and character of existing residential development when considering design, this will be informed by a Landscape and Visual Impact Assessment (LVIA) which would include consideration of the height and design of existing residential development in the area.

13. Personal

Consultation comments:

- Impact on health, wellbeing and quality of life
- Attraction of area
- Residents in this area get a poor deal from WBC compared to Newbury/Thatcham
- The field and recreation ground is the reason for moving to the area
- Impact on social integration which is already at breaking point and cannot be improved by constantly building more housing
- Would be unable to say hello to the horses
- Need open spaces for walking/relaxing

Council response:

New development itself is unlikely to impact on health and wellbeing.

All new development will be required to be designed to reflect the character of the existing residential areas; therefore, there should be no impact on the attraction of the area.

Development of this site will not impact on the recreation ground, or the woodland meaning that they would still be available for recreation and walking. An alternative grazing field for the riding stables would be provided, so there would not be an impact on viability of the stables.

14. Pollution

Consultation comments:

- Climate Change
- Light pollution leading to a reduction of views of the night sky and impact on ecology
- Air quality reduction as a result of additional traffic
- Noise pollution as a result of additional traffic
- Construction traffic noise
- Water quality

Council response:

All development is expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 of the Core Strategy.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution. The Ecological Assessment submitted by the Site Promoter highlights the potential impacts of light pollution on wildlife and sets out recommendations for careful planning of lighting during construction and as part of the development design.

It is unlikely that development of the site will have a significant impact on noise pollution levels.

It is unlikely that development of this site will impact on water quality as the site is not within a source protection zone.

15. Settlement boundary

Consultation comments:

- Breaching settlement boundary
- PC object to any changes to the settlement boundary
 - Protects the AONB from intrusive development
 - Settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. Proposing redrawing of the settlement boundaries goes against their purpose and the value they provide. It also sets a precedent for this being done in bigger green areas and in the AONB. Boundaries should not be redrawn to meet government housing number criteria
 - Consideration of moving settlement boundaries shows a lack of thought and consideration going in to this proposal
- Threat of development on further areas beyond the SB in the future – gap between Tilehurst and Purley, and Tilehurst and Calcot has been lost, do not want to lose gap between Theale and Pangbourne

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

16. Comments from site promoter:

- The site is available and deliverable within the plan period
- It is well related to existing development, services and facilities
- It can make a positive contribution towards meeting housing needs
- The site is under option to Horstonbridge Tilehurst Limited, who are working with Darcliffe Homes to deliver high quality, sustainable residential development on the site
- A bespoke solution to the development of the site would be delivered seeking to protect the assets of the site and the wider area whilst making best use of the available land
- Support the allocation of the site
- A detailed topographical survey of the site indicates that the site extends to 1.4ha (not just under 1ha as set out in the DPD) and could accommodate approx 50 dwellings based on a density of 30 – 40dph. This would make best use of the land

- An indicative framework plan has been prepared and includes landscape buffers and public open space – the indicative plan identifies a development area of 1.3ha capable of accommodating about 50 dwellings.

Highways and transport

- Access is proposed via the existing access gate onto Sulham Hill
- A TA has been prepared for the site. This demonstrates satisfactory access can be achieved from Sulham Hill and would utilise the existing field access which is at grade with the carriageway on Sulham Hill. There would not be any loss of existing landscaping
- Adequate visibility splays can be provided for the access onto Sulham Hill
- Access on to Clements Mead (as proposed by the DPD) would not be favoured as significant engineering works would be required, which would reduce the developable area of the site
- A pedestrian access and new footway would be provided at Sulham Hill, linking to the existing footway on Chapel Hill.
- Alternative pedestrian access could be provided to the bus stop
- A new pedestrian access would be provided to Home Place to the northeast of the site
- There is no public access to the site. It is used as grazing land for Hall Place Farm Equestrian Centre.

Equestrian centre

- The Equestrian centre occupy the land under a tenancy agreement, and alternative land would need to be provided should this site become unavailable
- This alternative site would be on the west side of Sulham Hill so would remove the current need to cross/travel along Sulham Hill – improving safety for horses and riders.
- It is unlikely that development would adversely affect the business

Landscape

- The current residential development is clearly visible across the site, therefore, set back from Sulham Hill and planting of a woodland tree belt would be unnecessary
- Access would be preferred from Sulham Hill, with appropriate landscaping to be provided
- Tree planting along the boundary with the recreation ground is considered unnecessary – the current hedge would be retained and an appropriate set back provided. These matters should be dealt with at planning application stage

Minerals

- This site is not within a preferred area for mineral extraction
- It is unlikely that gravel extraction on the site would be supported

Summary of changes suggested

- Increase housing number from 29 to 50 to reflect the area of land available 1.4ha (30 – 40dph)
- Access from Sulham Hill
- Creation of woodland belt along Sulham Hill should not be a requirement of development
- Tree planting along the boundary of the recreation ground should not be a requirement of development

Council response:

Comments noted.

The density of development on the site should be in keeping with the density of the surrounding area. A density of approximately 35dph is considered appropriate, and in keeping with the density of Clements Mead itself.

The Council's Landscape Assessment states that access to the site should come from Clements Mead, with the development facing the existing development.

Tree planting and landscaping are required along the boundary of Sulham Hill, in line with the requirements of the Landscape Assessment, to mitigate the impact of development on the site on the AONB.

The exact details of tree planting and landscaping would be dealt with at planning application stage and be informed by a Landscape and Visual Impact Assessment (LVIA) for the site.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA033: Land to the east of Long Lane and south of Blackthorn Close

Total responses received: 1,317.

Template responses received: 954 (72%). 11 individual templates were received:

- EUA003 008 031 033 template (1)
- EUA003 008 031 033 template (2)
- EUA003 008 031 033 template (3)
- EUA 007 template (1)
- EUA 007 template (2)
- EUA 007 003 008 031 033 template (1)
- EUA 007 003 008 031 033 template (2)
- EUA 003 008 033 template (1)
- EUA 003 008 033 template (2)
- EUA 003 008 033 template (3)
- EUA 003 008 template (1)

A petition objecting to the development of EUA007, EUA008 and EUA003, EUA031, EUA033 with 2,218 signatures was submitted to the Council.

1. General

Consultation comment:

- Residents feel abandoned by the Council in all aspects of the community.
- The attraction of the area will be affected by development.
- The site is part of the community's cultural memory.
- Building more houses will attract more business which in turn will lead to more housing demand – development should be directed to the Midlands and the north of England.
- Members should place pressure on the Government to change its demands for excessive house building and instead put investment in housing in areas of the country not benefitting from economic recovery.
- Unclear in the consultation letter whether EUA033 will be allocated as a site for Gypsies, Travellers and Travelling Show People?
- The site, which is located within the greenbelt and close to Sulham Woods, has been mis-named as being within the 'Eastern Urban Area'.
- Are the proposals based on reasonable economic grounds or political?
- Rural areas in the UK are being lost at an alarming rate.

- There will be significant financial gains for landowners from the development of the site for residential use. This is unfair because local residents' quality of life and property values would be reduced.
- Council's profiteering out of control and irresponsible.
- Development will impact on property prices. Council planning officers either live outside of the district or in villages in West Berkshire that are safe from development and have no interest in what happens in the eastern periphery of the district.
- New dwellings will be occupied by people from outside the area.
- There is significant opposition to proposals – the high level of responses to the consultation and the petition submitted should be given due weight and consideration.
- 12-16 flats are proposed in Chapel Hill.
- As a consequence of development, Tilehurst will no longer offer a balance between rural areas and developed land.
- Will environmental and geological surveys be undertaken for the site?

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 (Design Principles) of the Core Strategy and the Quality Design Supplementary Planning Document.

The Council is required to meet its own housing need. It is not the role of the DPD to direct growth to other areas of the UK. Development on the edge of settlements is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. Where the Council are aware of suitable brownfield land, or sites with existing planning permission, this has been taken into account. Sites within the settlement boundary are not to be allocated, as there is already a presumption in favour of development.

Should the site be allocated and a planning application subsequently submitted, then provision of green and amenity space would be required in line with Core Strategy policy CS18 on Green Infrastructure.

The sites that were assessed as potentially developable within the SHLAA provided the basket of sites from which the shortlisted sites for allocation within the HSA DPD were selected.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

Development of any site will lead to some financial benefit for the landowner and site developer. All developments are required to provide financial contributions, in terms of the Community Infrastructure Levy (CIL) to help to mitigate the impact of development on the local environment, community and infrastructure. Therefore, development does bring some benefits to existing local residents in terms of improved services and facilities.

The final allocated sites within the Housing Site Allocations DPD will still need to be subject to a planning application. Policies to guide the allocated sites will be set out within the proposed submission draft of the DPD.

The site promoters of EUA033 have submitted a Constraints Plan, Ecological Assessment, Flood Risk Assessment, Geo-Environmental Assessment, Historic Environmental Assessment, Landscape and Visual Appraisal, Opportunities and Indicative Development Framework Plan, Transport Statement, Tree Survey, and a Utilities and Foul Water Assessment. These studies can be viewed on the Local Plan Consultation Portal website:

http://consult.westberks.gov.uk/common/search/advanced_search.jsp?id=862505&sortMode=response_date&lookingFor=representations&tab=list (comment ID: hsapo8419).

The site has been shortlisted for housing allocation and not as a site for Gypsies, Travellers or Travelling Showpeople.

2. Principle of development

Consultation comments:

- Disagreement with the SHLAA recommendation that the site is 'potentially developable'.
- Site is greenfield and development would have a major negative impact on environmental sustainability.
- Suspect and flawed scheme. Residents will take a legal look at the people and organisations involved.
- Loss of A1 agricultural land.
- The vision should be extended to plan for a community.
- Feeling that Tilehurst is a 'dumping ground' for development not wanted elsewhere because it is located between two authorities.
- Housing on the edge of Reading should be provided by Reading Borough Council.
- The area an easy target for development because it is located at the edge of the district.
- No space for development – focus should be on other communities.

- Disproportionate amount of development has taken place within a small area compared to other parts of the district. The Long Lane corridor and area south of Dark Lane has changed beyond recognition over the last 14 years.
- The site should be preserved for future generations.
- The Council should not rely so heavily on site promotion by developers.
- David Wilson Homes advised following the residential development of land adjacent to the site that there would not be development on this site.
- Members should lobby for changes in town planning to enable high rise developments take place and not urban sprawl.
- Affordable housing is not affordable
- The rejection reasons for Pincents Hill apply to this site, ie. transport, landscape, loss of strategic gap between Reading and Theale.
- Exclusion reasons for EUA029 and EUA033 apply to this site, ie. access, proximity ancient woodland. Why are the conclusions different?
- Lack of consistent approach – ref a recent planning application (ref: 14/00892/FULD) for a house that's back garden backs onto the AONB dismissed at appeal.

Council response:

The site is located within West Berkshire and has been submitted to the Council for inclusion within the Strategic Housing Land Availability Assessment (SHLAA). It is therefore acceptable to consider the site for development. The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While there may be other, these may not be available, e.g. they may not have been submitted to the Council through the SHLAA or are not in accordance with the spatial strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

The Core Strategy allocates strategic development sites, and the role of the Housing Site Allocations DPD is to implement the framework of the Core Strategy by allocating non-strategic housing sites across the district.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

All comments made on the plan are submitted to the Inspector. The Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and that the Duty to Cooperate, legal and procedural requirements have been met.

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Spatial Area. Each spatial area has its own housing requirement to be delivered. The Core Strategy makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary, therefore the HSA DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy.

The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Urban Area would be able to take the amount of development proposed.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

Reading Borough Council was consulted on the Core Strategy, and is therefore aware of the housing requirements for the Eastern Urban Area. This part of West Berkshire has a close functional relationship with Reading, and West Berkshire Council continues to work in partnership with Reading to address cross boundary issues and requirements through the Duty to Cooperate.

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified based on a range of factors, including sustainability and number of services and facilities available.

Brownfield land that the council has been made aware of is included within the SHLAA. Where suitable sites are available these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development

on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Affordable Housing is defined by the NPPF as social rented, affordable rented and intermediate housing (eg. shared equity) provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable rented housing is let by registered providers of social housing (such as a Housing Association), and rent controls are in place that require rent of no more than 80% of the local market rent. "Low cost market" housing is not considered as affordable housing for planning purposes.

At preferred options the site at Pincents Hill formed one of the preferred options consulted on by the Council. The site promoters of Pincents Hill have put forward a considerably smaller scheme than that considered as a planning application, which aims to respond to and address the concerns raised at the appeal, in particular landscape objections, and protect the majority of the site in perpetuity. If the site was to be allocated for development the principle of development on the site would, through this process, be established as acceptable.

EUA029 was ruled out from shortlisting because the site could accommodate less than five dwellings and due to the impact on the AONB. The site assessment process focused on sites that have been assessed as potentially developable within the Council's Strategic Housing Land Availability Assessment (SHLAA). The SHLAA methodology only considers sites with the potential to deliver 10 or more residential units.

The assessment has indicated that part of the site would be suitable for development subject to certain mitigation measures to reduce the potential impact on the AONB. Protection of the AONB is paramount, and where a site was considered to cause harm to the AONB it was not included within the Housing Site Allocations Development Plan Document Preferred Options. The process for allocating sites is different to that of considering a planning application. Where a site is allocated for development the principle of development is established. Each planning application is judged on its own merits.

SA/SEA

Consultation comments:

- SA/SEA: Site selection – site assessment:
 - 'Summary of Site Assessment' – no reference to only part of the site being suitable for development.
 - 'Parish Council consultation response' – no reference to the site being 'outside of the settlement boundary', 'outside of the settlement' and that it would encroach directly into the AONB and would have a negative impact

on the ancient woods that abut the east boundary of the site, only 15-20m away. Development would set a precedent for further development beyond this site (“infill development”).

- ‘Parish Council consultation response’ – the comment that the site is ‘currently very wet’ suggests that the site is more often ‘not wet’ than ‘very wet’. The site is “frequently wet” in the “drier” months of spring and summer and “always wet” during the autumn and winter.
- ‘Parish Council consultation response’ – Tilehurst Parish Council’s views of site EUA003 should apply to this site, eg. there are insufficient facilities to sustain more development as the local Schools, Doctors Surgery’s and Dental Practices are all over subscribed.

Council response:

Comments noted. Where appropriate the site assessment forms has been updated to reflect the outcomes of the preferred options consultation, in addition to further technical work undertaken.

Alternative locations

Consultation comments:

- Land of lesser environmental value should be allocated.
- There are other sustainable areas in the district which offer less harm than the proposed site – Hungerford, Upper Basildon, Boxford, Wickham, Winterbourne. Areas between Theale and Thatcham, Greenham/Crookham Commons.
- Review of employment sites is needed as there is sufficient waste land and empty offices that could be used to meet the housing numbers – this issue should be resolved before considering Greenfield development.
- Lesser impact of development in Newbury and Thatcham due to investment in infrastructure and employment. There is also limited opposition to the Thatcham sites.
- The housing requirement should be met through the use of second homes, vacant properties and empty churches.
- Empty space in Scotland.
- Former mineral extraction sites.
- Public land that is not used for the benefit of the public, eg. AWE, schools, chemically farmed agricultural land, flood plains, woodlands, ancient woodland, Sites of Special Scientific Interest, AONBs, green belt and new towns.
- Locations within or near the AONB where landscape quality low and visual intrusion minimal.
- Infill sites within towns and villages, inc. redevelopment of derelict areas, Horncastle Ford site.

- Areas where there are employment opportunities.
- Why has London Road Industrial Estate (300 homes) been excluded?
- Scrubland near the footbridge in Theale.
- Out of town shopping centres that are no longer in use.
- Theale Lakeside has planning permission but not identified in the preferred options document.
- EUA035 has the potential to offer a greater area than the identified 1.2ha, eg. all of the area within the red line in addition to land to the west of the site with access directly on to the A339.
- Opportunities for development on land adjacent to Sherwood Rise in Purley should be explored with the landowner.

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites promoted to the Council via the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy (which does not include Upper Basildon, Boxford, Wickham and Winterbourne). While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

Guidance on SHLAAs (contained within National Planning Policy Guidance) identifies that particular types of land or areas may be excluded. In applying the practice guidance, the Council has excluded, amongst others, Sites of Special Scientific Interest (which include Greenham and Crookham Common) and Floodplain Zone 3b.

The site is not located within statutory greenbelt. No such designation exists within West Berkshire.

The Core Strategy restricts against development that could harm habitats or species of principal importance for the purpose of conserving biodiversity, and the integrity or continuity of landscape features of major importance for wild flora and fauna.

The Core Strategy made it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary, therefore the HSA DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

It is anticipated that a revised scheme for north and south Lakeside will be received, which will provide a similar number of units overall, but over a larger site area. It is the site promoter's intention to submit a revised planning application.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing. Work on a new Local Plan will include a review of employment land.

A comprehensive masterplan is being developed for the London Road Industrial Estate (LRIE). Due to the timing of this, and the site's designation as a protected employment area, it has not yet been possible to identify the site for allocation. It cannot therefore contribute to the delivery of housing numbers in the HSA DPD; however it is proposed to identify the site as an area for future allocation. It is expected that this site will come forward as part of the new Local Plan.

The majority of minerals sites have conditions restricting the use of the land once extraction has been completed, in the majority of cases these sites are required to return to their previous natural state.

The volume of responses received will not influence the location of development as it is the planning issues identified in the responses received which will be important. The volume of objections received illustrates the amount of people concerned by the issues raised.

Land use

- It is a Government requirement for brownfield sites to be developed before greenfield sites. These have more limited impact on the environment and on infrastructure.
- Brownfield sites have been excluded because they raise less revenue than greenfield sites.
- There is sufficient brownfield land for 10 years worth of development before any greenfield sites are needed. A comprehensive list of brownfield sites should be provided by the Council that identifies what sites available/considered, with justifications for any rejections.
- Brownfield sites are being withheld to accommodate additional development if the housing requirement increases.
- There is a limited amount of brownfield sites in West Berkshire because there is not a history of major industrial use in the district.

Council response:

Where the Council are aware of suitable, available brownfield land this has been taken into account in calculating the remaining housing requirement. All sites, including brownfield sites, which have been submitted to the Council, are listed in the Strategic Housing Land Availability Assessment (SHLAA).

Housing numbers

Consultation comments:

- The regional tier of government which set housing numbers has been abolished. There is no longer a need to sacrifice green spaces if specific housing numbers do not have to be met. Within the AONB, national policy (Planning Policy Statement 7, paragraph 21) should now frame the options within which choice is exercised, eg. address local needs.
- Has it been proven that there is demand for more housing in this area which is recognised as being within a successful economic region in England – the Thames Valley?
- The housing requirement imposed by the Government has been accepted by the Council because of its dependency on the Government for funding and the belief that the economy benefits the majority of the population.
- The proposed number of dwellings on the site would make a minor contribution to the overall requirement (0.29% of the total). The site could therefore be removed and the Council would still achieve its housing target.
- The remaining housing requirement could be met elsewhere in Berkshire.
- There should be a focus on building affordable 3-4 storey flats for the younger generation. A significant increase in supply would stabilise property prices and increase affordability for more people. Building 50-100 houses in Tilehurst will not solve the issue.

Council response:

The Core Strategy was adopted following the publication of the National Planning Policy Framework. The HSA DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The housing number is, however, being reviewed through the production of a Strategic Housing Market Assessment and is likely to increase.

The Core Strategy sets out that the Eastern Urban Area will require new homes to support the growth of the Reading area, and that the allocation of sites will be required. Although the sites are in the AONB, landscape assessment work carried out on behalf of the Council indicates that part of the sites is suitable for development subject to appropriate mitigation measures.

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement of approximately 1,000 dwellings. In comparison the Eastern Urban Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings.

A windfall allowance has been taken into account when calculating the remaining housing requirement for the district.

Planning policy

Consultation comments:

- Proposals another example of the ongoing violation of existing planning processes, rulings and agreements. Previous, historic agreements for the area have been ignored, eg. residential development proposal at Pincents Hill (rejected by Secretary of State), a promised swimming pool and recreational facilities in Tilehurst, M4 Junctions 12-3 'smart motorway'.
- Against the NPPF: paras 70, 72, 73, 74, 77, 115, 118, 123.
- Against Core Strategy Policies: CS1, CS13, Cs14, CS17, CS18
- Development would be contrary to the Planning Obligations SPD (paragraph 9.2) – development will result in a loss of environmental quality.

Council response:

The previous scheme that was submitted for Pincents Hill was submitted as a speculative planning application which was at this time against planning policy, therefore the Council had an in principle objection to the proposal. The site promoters have put forward a considerably smaller scheme which aims to respond to and address the concerns raised at the appeal, in particular landscape objections, and protect the majority of the site in perpetuity. This revised scheme is being considered through the plan led system, ie. through the preparation of the Housing Site Allocations DPD, and therefore, if the site was to be allocated for development the principle of development on the site would, through this process, be established as acceptable.

The Infrastructure Delivery Plan of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

The Council are aware of Highways England proposal for a smart motorway between J.12 (Theale) and J3 (Hayes) of the M4.

The NPPF states that the development plan, in this case the Core Strategy, is the starting point for decision making. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF aims to proactively drive and support sustainable economic development to deliver homes and businesses, and requires Local Authorities to identify and meet their housing need, taking account of market signals and setting out a clear strategy for allocating sufficient land for development.

All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant effects of the policies and proposals on environmental, economic and social factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

The requirement for the allocation of sites, including greenfield sites, for development is set out in the Core Strategy. All allocated sites will be required to comply with the policies of the Core Strategy.

Consideration of the local character of an area is a crucial factor in site design.

Areas of landscaping, buffers and public open space, including a play area are proposed for the site (as set out in the indicative framework plan).

A travel plan would be required to accompany a planning application for the site; this would set out a number of measures to encourage new residents to consider walking, cycling and other alternatives to use of the car for everyday journeys.

Precedent for future development

Consultation comments:

- However 'small' the initial development, where will it end? There will be left with nothing but concrete.
- Much infill development has taken place in this area on a piecemeal basis and this proposal will permit a steady trickle of development in the area.

Council response

Settlement boundaries will be redrawn around any sites that are allocated to protect those areas outside of the new boundary from development.

3. Consultation process

Consultation comments:

- Lack of time to respond adequately to the consultation.
- The consultation was held during the school holidays.
- The letters received advising of the consultation were not marked as being from the Council and could have easily been mistaken for junk mail.
- 100 metre consultation zone inadequate – the proposals will affect a wider area.
- Difficult to submit comments on the consultation portal website.
- The Council's process for communicating a high impact consultation has been limited.
- The consultation was a paper exercise and comments will not be taken into account.
- Consultation process dubious – the timing indicates that the Council are trying to push through the proposals.

Council response:

The Preferred Options consultation was an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. There is no statutory requirement to undertake a preferred options consultation, however the Council felt that it was important to ascertain the views of the local community at the early stage of the planning process so that views could be taken into account before final decisions are made.

The consultation period was extended from the usual six weeks so that it ran for seven weeks. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were encouraged to engage with local people, at this stage, and to feedback local views. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation. There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

Public consultation on the preferred options stage of the DPD involved notifying all those registered on electronic consultation database, the documents were published on the website with a link to the consultation from the Council's homepage, copies were available to view in the District libraries and the Council Offices, and as is the case with consulting on major planning applications, letters were sent to properties located within 100m radius of the proposed sites, and a press release was issued.

The Council also published a Local Plan newsletter in April 2014 notifying of the upcoming consultation in July. Unfortunately it is not feasible to write to every individual property within the District, but with the various notification methods above, coverage in the press and inevitably some word of mouth, the consultation was extensive with around 4,500 people making around 8,500 comments. Parish Councils were also asked to publicise the consultation.

4. Crime and security

Consultation comments:

- Increases in population and density result in higher crime levels, in particular anti-social behaviour.
- Crime rate in the area is low – 23.68 crimes per 1000 residents.

Council response:

All development will be designed to create safe environments, addressing crime prevention and community safety as required in national and local policy.

5. Cultural heritage and the historic environment

Consultation comments:

- Development would be contrary to one of the Core Planning Principles of the NPPF – allocating the site would not protect or enhance the historic environment.
- Site is one of the last remaining 18th century irregular fields.
- Site selection – Sustainability Appraisal/Strategic Environmental Assessment: Developing one of the last remaining 18th century irregular fields on the plateau edge and an area of wooded pasture which is a key characteristic of AONB in this area will impact on green infrastructure in the area.
- Has a full archaeological survey been undertaken?
- There is evidence of a large battle during the Dark Ages (Battle of Reading in 871).

Council response:

The site is a surviving parcel of a pre-18th century field system. The site lies within a sensitive Historic Landscape Characterisation area. The site promoter has prepared a Historic Environmental Assessment for the site (and sites EUA008 and EUA031), and this has been reviewed by the Council's Archaeological Officer who has advised that should the site be allocated, it would be advantageous if the outline of the field could be preserved should the site be allocated and subsequently developed.

6. Density

Consultation comments:

- The SA/SEA states that the potential for the site is 30 dwellings (1ha at 30dph); however the Landscape Character Assessment states that development should be limited to the area below the 90m AOD contour line. The proposed developable area of the site is therefore 0.65 hectares, meaning the site has the potential for 19 dwellings (at a medium density of 30dph) or 13 dwellings (at a low density of 20dph)
- Why is the site categorised as a 'medium density' housing area? The average for the whole of Tilehurst is low density, 20dph.
- Limiting the developable area of the site to below the 90m AOD contour would not enable a mix of dwelling sizes or types.

Council response:

The map which illustrates the shortlisted sites in the Eastern Urban Area (Purley-on-Thames and Tilehurst north) on page 62 of the preferred options document highlights the red line boundary of the site and the potential area for development. It is not to scale. The landscape assessment does not give an indication of the area of the site that is suitable for development.

The densities set out in the preferred options document are indicative. The suggested density has been based upon the character and size of the site, and the distance of the site boundary to a town/district centre. This provides a rough indication of the capacity of the site without taking constraints into account. The final densities for the sites, should they be allocated, would be subject to discussion with the landowner, more detailed work at the planning application stage and consideration of Core Strategy policy CS4 (Housing Type and Mix) which sets out density requirements. The density of development close to the site ranges from approx. 34dph at Clements Mead to approx. 19dph at Vicarage Wood Way.

Policy CS4 of the Core Strategy DPD also expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the needs of all sectors of the community.

7. Ecology

Consultation comments:

- Development will result in the destruction of wildlife habitats and wildlife corridors for a range of species – birds (including Skylarks, Red Kites, Barn Owls, Grey Partridge), bats, badgers, deer, foxes, small mammals, reptiles (including adders,

Great Crested Newts, slow worms), insects (including bees), flowers and plants – some of which are protected/endangered.

- Previous developments have resulted in the gradual decline in small mammals which have been driven further down Sulham Hill and Sulham woods.
- Study shows 60% of species in decline (see: <http://www.bbowt.org.uk/stateofnature>).
- Disturbance due to trampling, litter and fly tipping as well as the introduction of domestic animals.
- Increased lighting near the woods will impact on wildlife.
- Pressure on nearby ancient woodland (Sulham Woods) and trees (including those which have Tree Preservation Orders).
- Highway improvements (eg. provision of footpaths and road widening) and drainage works will impact upon trees.
- There is regenerated Elm from the remnants of Dutch Elm devastation on Long Lane. The only mature Elm trees left in the UK are around Brighton.
- Trees will be cut down. It is unlikely that new tree planting will equal the original trees capacity for carbon capture or screen houses from the AONB.
- Hard to visualise any satisfactory natural buffers between the site and the adjacent ancient woodland given that the site has been recommended for an unusually high density (30-50 dwellings per hectare).
- The site is in close proximity to Sites of Special Scientific Interest (SSSIs), and Local Wildlife Site, eg. Sulham Woods and Tidmarsh Woods and Meadows
- Has a full ecological assessment been undertaken or will one be undertaken to ensure the environment is not further damaged or destroyed?
- The site provides an opportunity to learn about wildlife and nature.
- Quality of life is reduced without nature.

Council response:

Initial screening of the sites by the Council's ecologist has taken place, and sites with significant ecological issues have not been taken forward as preferred options. The initial comments from the Council's ecologist advised that the site is part Biodiversity Action Plan (BAP) habitat, within a Biodiversity Opportunity Area (BOA), adjacent to a Local Wildlife Site, and there are badgers present on the site. As a result the site promoters have carried out an extended Phase 1 Habitat Survey which sets out a number of recommendations to limit, and reduce the impact on ecology. The Council's ecologist has reviewed the document and is content that, subject to the mitigation measures set out in section 7 of the survey there will not be a detrimental impact on ecology.

The site is adjacent to ancient woodland, and appropriate buffers will be required should the site be taken forward as an allocation and developed. There is generally a 15 metre buffer.

Trees protected by TPOs can be removed, with prior approval from the Council; usually permission is approved subject to alternative planting being provided on the site.

The ancient woodland adjacent the site is not designated a SSSI.

8. Economy

Consultation comments:

- The lack of local employment opportunities means people will commute.
- Site selection – Sustainability Appraisal/Strategic Environmental Assessment: Positive impact on economic sustainability questioned as the majority of the new occupants will be moving from one area of the parish to another so there will be no net economic benefit (unlikely that people from outside of Reading will occupy the site due to the higher prices in Reading compared to other locations - they are more likely to be moving from within Reading). Also, the site is not close to local services and amenities, has poor access to education and employment services, meaning that there will not be a positive impact on economic sustainability.
- The location of local businesses on the site would help to make the developments sustainable.
- Development will not improve the economic prosperity of the area. Long term economic benefits will be experienced only by developers and businesses in Reading.
- The influx of traffic to IKEA will result in people shopping in quieter areas. This will put the future of shops such as Sainsbury's, Next, Boots and Dunelm at risk.
- Increases in traffic will impact upon the running of local businesses that deliver goods.
- Financial and economic expansion should be targeted to regions of the UK that are in need of investment and growth.
- There has been a decline and under-development of local shops and businesses.
- Halls Place Farm uses the site and development would destroy this local business.

Council response:

Tilehurst is an Urban Area within the West Berkshire Settlement Hierarchy, as set out in the Core Strategy DPD. Urban areas are defined as having a wide range of services and are therefore the focus for the majority of development. The Core Strategy was examined by an Independent Inspector who agreed that based on the evidence provided the Eastern Urban Area would be able to take this amount of development.

There are a number of employment opportunities in the Eastern Urban Area, with Arlington and Theale Business Parks to the south, and good links from Tilehurst Railway station to Reading and Oxford.

There are regular public transport services throughout the Eastern Urban Area, with a number of bus stops within half a mile of the site. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application. The site is approximately 2.6km from Tilehurst Railway Station, this is just over the Chartered Institute of Highways and Transportation's (CIHT's) acceptable walking distance for Commuting of 2km (CIHT, 2000), however, it is within cycling distance.

The HSA DPD is only considering the allocation of housing sites. A new Local Plan will be prepared following the adoption of the HSA DPD in September 2016, and this may include allocations for mixed use developments, and will consider retail and businesses allocations.

New development leads to economic benefits by way of support to jobs in the construction and wider supply chain, and an increase in expenditure and economic activity in the area both directly and through the New Homes Bonus.

Visitors to IKEA may make linked trips to nearby shops. The consideration of traffic movements around the retail area would be considered as part of a planning application, should the site be allocated.

It is not the role of the HSA DPD to target financial and economic expansion in areas of the UK that are in need of investment and growth.

No comments relating to the allocation of the site have been received by Hall Farm Equestrian Centre, therefore, it is not considered likely that the development of the site would affect the viability of the business. The landowner of Hall Farm Stables (site EUA031) has an agreement with Hall Farm Equestrian Centre which states that should any field used by the stables become unavailable another suitable field will be provided in its place.

9. Flood risk

Consultation comments:

- Localised flooding a significant and persistent issue, especially on Long Lane. significant rainfall.
- The site is within a surface water flood risk area. There is poor water run-off and drainage in parts of the site. The site is often waterlogged. The introduction of

impermeable surfaces would increase surface water run-off and the risk of flooding.

- The land is predominantly clay.
- Drains are currently unable to cope with water run-off.
- There are a number of sink holes in the area.
- Attempts by the Council to stop flooding on Long Lane have failed – 3 times in 10 years.
- Since Denefield Gardens was completed water run-off has worsened.
- The Council's Flood Management Strategy (2013-2017) recognises local flooding as a problem, with sewer systems designed for a 1 in 30 year storm and highway drainage designed for 1 in 10 year storm. Any event over this level will result in overland flow resulting in local flooding.
- A Flood Risk Assessment and drainage proposals should be submitted if the site is allocated.
- Any flood mitigation measures would not be maintained by the Council.
- Properties will be unable to get house insurance due to the risk of flooding.
- Flood waters have eroded Long Lane.

Council response:

The site itself falls within Flood Zone 1 whereby there is a low probability of fluvial flooding. A small part of the site is at risk from surface water flooding.

The issue of flooding in Long Lane is noted, and this area is recognised on the Environment Agency flood maps as an area of deep surface water flood risk. Flooding at the entrance to EUA033 could be resolved through a costly technical solution, by raising the road level and introducing a culvert to maintain the surface water flow pattern. This is considered to be a significant factor affecting the deliverability of the site.

The site promoter has prepared a Flood Risk Assessment (FRA) which details that Sustainable Drainage Methods (SuDS) are to be provided to reduce the risk of surface water flooding. This has been reviewed by the Council's Highways team. Concern has been raised about the method proposed for managing surface water run-off, and suggests that to make the site work in terms of SuDS, shallow infiltration will be required with more extensive open SuDS such as open attenuation ponds, reedbeds and swales. Such open SuDS should be designed to work in conjunction with (and downstream of) permeable paving, however because of the effect on land allocation, such measures should be planned at the very early stages of site layout and design. At this stage, the question of off-site discharge, as proposed in the FRA, can be considered if the SuDS measures provide compensation for the negative effects of the discharge.

10. Gaps between settlements

Consultation comments:

- Development would be contrary to the NPPF (paragraph 80) – development would allow unrestricted sprawl in the greenbelt and the site is not derelict or urban land.
- Development will extend the boundary of Reading, risking becoming physically part of Reading.
- Loss of gap between settlements (Tilehurst/Pangbourne/Purley/Tidmarsh, Calcot/Theale). The gaps between Tilehurst and Purley and Tilehurst and Calcot have already gone.
- Long Lane is a natural barrier to the developed area of Tilehurst and open countryside to the west.
- Gaps enable identity of settlements.

Council response

The site is not located within statutory greenbelt. No such designation exists within West Berkshire.

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of our Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19 (Historic Environment and Landscape Character) of the Core Strategy.

Policy ADPP4 (Eastern Area) of the Core Strategy also seeks to maintain and enhance the individual identities of the settlements within the Eastern Urban Area.

11. Highways and transport

Consultation comments:

- Lack of road maintenance.
- Space for shared vehicles (car clubs) should be provided if required.
- Distance of the site from local centres will increase traffic levels.
- Distance of the site from Tilehurst rail station makes commuting by car likely.
- Communities should be designed to have a mix of uses that enable residents to make local journeys without reliance on cars.
- Street furniture and traffic congestion has resulted in Long Lane losing its 'lane' personality.

Council response:

Comments noted. This is not a planning issue.

In line with the Core Strategy, all development will be required to show how it improves travel choice and reduces the use of single occupancy cars.

There are bus stops with a regular bus service provided by Reading Buses to and from Reading that pass within 400m of the site. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

The centre of the site is approximately 2.6km from Tilehurst Railway Station, this is just over the Chartered Institute of Highways and Transportation's (CIHT's) acceptable walking distance for commuting or travel to school of 2km (CIHT, 2000), however it is within cycling distance.

Access:

Consultation comments:

Significant improvements required to the highway and footpaths which would result in the removal of vegetation and trees.

- There is a need to widen Long Lane.
- Proposed access to the site in a dip (at the bottom of a valley) which floods.
- Poor sight lines at junctions in the area.
- There are limited options for alternative modes of transport in the area. This will result in reliance on the car.
- The natural topography of Tilehurst restricts access to and from the area.
- Disagreement that access should be as close to the urban edge as possible.

Council response:

There is significant concern regarding access to this site. A number of significant highway improvements would be required. These include widening Long Lane, improvements to the Long Lane/Sulham Hill junction and improvements to resolve the potential flood risk at the proposed entrance to the site.

Highway network/traffic:

Consultation comments:

- Existing congestion and traffic disruption would be exacerbated by development, particularly at peak times.
- Congestion and traffic disruption as a result of development will impact on Long Lane, Dark Lane, Sulham Hill, Pincents Lane, Knowsley Road, Overdown Road, A329, A4, M4, Langley Hill, Bath Road, Chapel Hill, City Road, and Little Heath Road.
- Traffic volumes have not been addressed by the Council.
- The proposal for a 'Smart Motorway' at J12 of the M4 highlights that highways are unable to cope with the current volume of traffic.
- The opening of IKEA and the transfer of the Berkshire Fire Service HQ will increase congestion.
- Lack of public transport has increased car reliance.
- Individually sites may not have an impact, but there would be a cumulative impact from developing EUA003 and 008, EUA031 and EUA033.
- A Transport Assessment would not be required because the number of dwellings proposed for the site falls below threshold in Department for Transport guidance on Transport Assessments.
- Local roads are currently used to access the M4, eg. Long Lane, Sulham Hill, Mill Lane.
- Roads are not wide enough for 2-way traffic eg. Long Lane, Sulham Hill.
- Policy of building narrow roads with limited parking will increase traffic movements.
- New residents will be commuters who do not work locally and this will add to traffic movements.
- Localised road widening will move bottlenecks to other areas.
- Traffic calming has resulted in other areas becoming rat runs, eg. Fairford Road.
- Speeding traffic along local roads an issue.
- Several blind bends/poor sight lines at junctions, eg. Long Lane/Sulham Hill junction.
- Country roads are unable to cope with HGVs.
- Opening up of Pincents Lane to the north would create an even greater strain on the road system drawing traffic from Pangbourne and West Reading.
- Local roads impassable in the snow – no snow clearing equipment provided by the Council during heavy snowfall in 2010.

- No space to build more roads.
- Will a traffic management survey be undertaken for the site?

Council response:

The Council has commissioned Transport Assessment (TA) work to assess the impact that development of the shortlisted preferred option sites would have upon the highway network. The TAs indicate that the sites themselves are unlikely to have a significant impact on the highway network, meaning that there will be limited impact on local congestion.

Detailed modelling is not available for this site; however the site promoter for EUA033 has prepared a Transport Assessment. This has been reviewed and verified by the Council's Highways department, and is considered to be a reasonable assessment of the impact of the site. The site is not expected to generate significant amounts of traffic, and therefore there will be a limited impact on congestion as a result of the development of the site. This assessment does consider the cumulative impact of this site with other sites in this area.

The Council will be closely assessing the actual impacts of the IKEA store once it is open. This may influence the allocation and/or the phasing of the housing sites. The relocation of the Fire and Rescue Service HQ has already taken place.

The improvements to the A4 (dualling), and the proposed Smart Motorway scheme for the M4 (Junctions 3 – 12) aim to improve traffic flow and journey time reliability. Smart Motorways help relieve congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limit to keep traffic moving smoothly. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth. Consultation has taken place with Highways England, who have not raised any concerns regarding the development of this site.

The Council's Landscape Capacity Assessment states a preference for the access to EUA033 to be from Long Lane at the closest point to the houses on Blackthorn Crescent to maintain the rural character of Sulham Hill.

The Council's Highways department has advised that road widening is required along Long Lane to a width of 5.5 metres eastwards from site EUA008 up to Vicarage Wood Way. Long Lane should be widened to 5.5 metres westwards from site EUA008 to Sulham Hill; however narrowings with one way working could be considered when appropriate to protect key trees. Widening of Sulham Hill is not required.

In respect of sight lines at the Long Lane / Sulham Hill junction, where 2.4 x 44.0 metres were recorded to the west and 2.4 x 38.0 metres were recorded to the east,

the Council's Highways team have advised that these sight lines are only sufficient for vehicle speeds of 30 mph and 27 mph respectively. It is likely that vehicle speeds will be much higher than this along Sulham Hill, and therefore consideration will need to be given to improving this junction to improve sight lines to accommodate any additional traffic.

Without the suggested improvements from the Council's Highways Team, the site would be unacceptable from a highways authority point of view.

Road safety

- An increase in traffic will reduce road safety and safety for cyclists and pedestrians.

Council response:

Transport Assessment work would need to be carried out if the site was to be allocated, this would need to consider improvements to road safety for pedestrians and cyclists.

Parking

Consultation comments:

- There would be insufficient parking on the site.
- There would be parking overspill onto roads outside of the development, eg. onto Long Lane, Clements Mead.
- Space for parking in new developments should be reduced for vehicles in private ownership.
- Insufficient parking at Tilehurst Railway Station.
- Insufficient parking at local commercial facilities and shops, eg. Hilden's Drive, The Colonnade.
- Poor parking around schools in the local area, eg. double yellow line ignored

Council response:

Previous parking policies to restrict the amount of parking provided in new developments have caused a number of issues in terms of overspill on-street parking and conversion of front gardens to parking spaces. As a result, new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may

want to own cars, even if they do not use them for everyday journeys, and therefore, need provision for parking.

The new parking standards also seek to ensure the delivery of good quality neighbourhoods with the level of parking required linked to the area and its accessibility and to the type of housing to be provided.

The issues of parking at local centres and at Tilehurst Station are noted. It is acknowledged that there is a need for additional car and cycle parking at Tilehurst Station. The Council will work with Reading Borough Council and First Great Western to determine what improvements would be possible.

The issue of parking outside schools is acknowledged. The Council work with schools through the School Travel Planning and Road Safety processes to reduce the number of children driven to school, and to improve safety outside schools.

Public transport

Consultation comments:

General:

- No joined up Public Transport Strategy.
- Development would be contrary to the National Planning Policy Framework (paragraph 31) – the Council is not helping secure more frequent and direct bus services to serve the proposed site.
- The Local Plan identifies Newbury as the main focus for economic development. Newbury is inaccessible by public transport from Tilehurst; therefore new jobs will be unattractive to Tilehurst residents due to difficulties in commuting.

Bus services:

- Limited public transport services – services 16 and 33 are 1km away from the site and other bus services from School Road are 2km away. Service 33 to be reduced and this highlights limited interest in bus use.
- Sites in close proximity to bus routes.
- Increased funding by the Council for bus services would result in more direct routes and bus services.
- Council has reduced subsidy to Reading Buses so bus fares have increased on the route running between Newbury and Reading.
- National planning policy (NPPF) requires local authorities to work to support infrastructure necessary for sustainable development.
- Buses overcrowded at peak times.
- New development should be a 10 minute walk from a frequent bus service.

Train Services:

- Remove from limited public transport services (4.5 miles to Tilehurst Railway Station)
- Tilehurst rail station is small and manned part time.
- Underground train system or monorail required to open up Reading to development.

Council response:

There are bus stops with a regular bus service provided by Reading Buses to and from Reading that pass within 400m of the site. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

The centre of the site is approximately 2.6km from Tilehurst Railway Station, which is just over the Chartered Institute of Highways and Transportation's (CIHT's) "acceptable walking distances" for commuting or travel to school which is set at 2km (CIHT, 2000), however it is within cycling distance.

It is noted that there is a need for additional car and cycle parking at the station. The Council will work with Reading Borough Council and First Great Western to determine what improvements would be possible.

Walking and cycling:

Consultation comments:

- No cycle paths in the area and none provided in the West Berkshire area.
- Lack of cycle parking at Tilehurst rail station.
- There is no public access to the site and this is respected by local residents.
- Development will increase pressure on Public Rights of Way.
- Footpaths in the area are in a poor state, eg. the path between the site and Blackthorn Drive overgrown.
- Scarcity of footpaths with suitable access to the woodland/green spaces in west Tilehurst.
- Footpaths in the area are well used for recreational purposes, eg. walking, cycling, horse riding.
- Development would directly impinge on the Berkshire Circular Routes.

Council response

The site is in private ownership and there are no recorded public rights of way across the site. Provision of footways would be considered at planning application stage if the site was to be recommended for allocation.

There is provision of an on road signed cycle route from Little Health School into Reading (R50).

12. Infrastructure

Consultation comments:

- Local services already struggle to cope with current demand and are oversubscribed.
- Long wait times for social services. Development would exacerbate this situation.
- Infrastructure has not kept pace with development.
- Dependence on services/facilities provided by Reading Borough Council. Unacceptable to place more pressure on these. Lack of investment in the area from West Berkshire Council.
- Despite developer contributions, there will not be enough money for the infrastructure improvements required.
- Section 106 money does not go where it is supposed to go.
- No provision of additional services/facilities is made in the preferred options document.
- Tilehurst was built as a village and does not have the services or facilities required for a larger settlement.
- Facilities/services in Tilehurst are inaccessible by alternative modes of transport.
- Without distinct town centres/community hubs there is urban sprawl.

Council response:

The Infrastructure Delivery Plan of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking as to whether the provision of additional services/facilities to serve the new population is necessary. New facilities/services as a result of development would also benefit the existing community.

Any redevelopment of the site would be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial contribution towards mitigating the impact of an increased population could be sought through the CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the Council will continue to work in partnership with Reading Borough Council to address cross boundary issues and requirements.

Education

Consultation comments:

- Development would place pressure on local schools. Additional pupils could not be accommodated.
- School place allocation for 2014 shows there is no spare capacity at the local schools, and many have waiting lists.
- No money for new schools.
- Section 106 funding to overcome need for additional school places would be inadequate in the short, medium and long term.
- Green spaces should not be sacrificed for new schools.
- Increasing class sizes impact on standards.
- Only school with capacity is Theale Green Community School in Theale, 5 miles away.
- Early years/nursery provision at capacity.
- Children unable to get into local schools will result in more traffic.
- Little Heath School now suffering from poor educational standards. Additional pupils will worsen standards.
- Catchment areas will change.
- Many pupils at West Berkshire schools come from Reading borough (40%). Forcing Reading pupils out of West Berkshire schools will cause a major problem in the area.
- More pupils will result in more litter and graffiti.

Council response:

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Emergency services

Consultation comments:

- Development would place pressure on emergency services

Council Response

As referred to above, the requirement for emergency services will be picked up through the Infrastructure Delivery Plan.

Medical services

Consultation comments:

- No GP surgery in the immediate vicinity, is difficult to access for those with limited mobility.
- Existing surgeries could not accommodate an increase in numbers. With a lack of GPs coming through, the NHS system will not continue to provide a required level of primary care medical services.
- 3-4 week wait for doctor appointments are not uncommon.
- One local surgery closed.
- Where will funding come from for medical facilities. S106 contributions would be insufficient. The Government has reduced the funding budget to GPs.
- The Royal Berkshire Hospital is already catering for twice the number of patients that it was built to accommodate. Appointment times run late.
- Services provided by the Royal Berkshire Hospital should be taken into account.
- Mental health services are overstretched. Long waiting times for therapy.
- Dentists oversubscribed and not accepting new patients. The nearest NHS dentist taking new patients is 3 miles away.

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan.

Recreation/leisure/Open Space

Consultation comments:

- No recreation facilities in the area.
- No local play areas.
- Lack of leisure facilities
 - Inadequate sports facilities.
 - Poor facilities at Cotswold Gym.
 - No local swimming pool – one was promised years ago.
- Few green areas accessible without the need for transport.
- Development would result in the loss of the riding school.
- No libraries within the proposed development boundary.

- The additional 1,400 houses required in the EUA will trigger the requirement for the provision of open space as set out within saved policy RL.1 of the West Berkshire Local Plan.
- The site is important green space for local residents and those from further afield.
- Site used by schools for outdoor activities.
- Maintaining green space should be a priority for the Council.
- Has the local community been given the opportunity to designate the land as Local Green Space as paragraph 76 of the NPPF allows?

Council response:

There is no commitment or provision for a swimming pool in the Core Strategy. There are a number of leisure facilities in the local area, although it is acknowledged that some of these are within Reading rather than West Berkshire. The nearest swimming pool to the site is Meadway Sports Centre approximately 3km from the site. The 'Your Reading Passport' which gives discounts at Reading leisure facilities, is not available for those living outside Reading. West Berkshire Council offers the 'West Berkshire Card', which offers discounts at leisure facilities within West Berkshire. Tilehurst Library is 1.5km from the site. The West Berkshire mobile library service visits a large number of locations within the Eastern Urban Area.

Allocated sites are not categorised as green infrastructure; instead the need to allocated development on greenfield sites is covered by policies of the Core Strategy that include ADPP1, ADPP5 and CS1. The site would need to be developed in accordance with the Landscape Character Assessment (2014) and a Landscape and Visual Impact Assessment (LVIA) would be required for the site if it was allocated. The LVIA would also set out the requirements for green infrastructure and the provision of public open space.

There are no prescribed distances between residential development and local play facilities. Local play facilities could be provided on the site, should it be allocated, or on other nearby sites that are allocated. The Council's Quality Design Supplementary Planning Document requires that gardens of family dwellings are large enough for children's play.

No comments have been received from the riding stables in response to the consultation. There is an agreement with the landowner that should the fields currently used by the stables become unavailable suitable alternative land will be provided.

The site is in private ownership, and there is no public access to the site.

No application has been made by the local community to designate the land as Local Green Space.

Utilities:

Consultation comments:

- Development will place a greater demand on water, gas and electricity services.
- Waste/sewer systems are over stretched. Development will add more pressure.
- Water supply – water pressure low. Plans do not indicate that Thames Water will be making a large investment to meet the needs of an increased population.
- New pumps required to supply necessary water.
- The site is within a groundwater protection zone. Development would therefore have a negative impact on the environmental sustainability of this site.

Council response:

The site promoter has prepared a Utilities Assessment to assess the feasibility of providing any development on the site with the necessary utilities (eg. gas, electricity, telecommunications, potable water and foul water infrastructure). The assessment concludes that all utilities are close to the site, and that there should be no issues connecting the site to the necessary utilities. The Assessment recognises that connection to utilities infrastructure would be subject to approval and available capacity within local networks.

Consultation has taken place with Thames Water and they have not indicated any water supply problems. In respect of sewerage, they have identified that the current wastewater network is unlikely to support the demand generated by the development. Thames Water have advised that an integrated water and wastewater strategy will be required at the planning application stage should the site be allocated for development.

The Council has a duty to supply waste disposal services, and these services would be extended to any new developments. The Council is in the process of developing a Minerals and Waste Local Plan, which will look at the provision of new waste disposal facilities if, and where, these are required.

The site is in SPZ3. The Environment Agency do not have an in principle objection to development in source protection zones. Some consideration may be required in relation to foundations and excavations to ensure flow paths are not created to the groundwater source.

13. Landscape/setting

Setting and character

Consultation comments:

- Development will change the character of the area, eg. loss of rural character.
- The existing settlement edge is already screened.
- The site is the last piece of rural Tilehurst.
- Development will result in the loss of views and sky views.
- Development would cause overshadowing and loss of daylight to existing residents.
- The Council does not have the ability or funding to maintain the current common open land or landscaped spaces.
- Development would result in the loss of one of the last remaining 18th century irregular fields on the plateau edge

Council Response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD.

The site promoter has submitted a Historic Environment Assessment for the site. This has been reviewed by the Council's Archaeology team and they have confirmed that there would be little impact on known heritage assets and that there is little archaeological potential in the developable area of the site and as such there have no issues regarding development on the site. In respect of the site being one of the last remaining 18th century irregular fields, the Council's Archaeological Officer has advised that should the site be allocated, it would be advantageous if the outline of the field could be preserved should the site be allocated and subsequently developed. This could be factored into any design.

AONB

Consultation comments:

- There are unverified statements within the HSA DPD preferred options document that appear to have been written by the site promoters and are incorrect or misleading, eg. the site is within the AONB *not* adjacent to the AONB.
- Development would harm the character/setting of the AONB.
- The site provides a physical connection between the AONB and urban development.
- Development would result in the loss of the green buffer between the AONB and existing residential development.
- There must be open green space between development and the AONB.

- It is a poor strategy to earmark sites in the AONB and doing so highlights a lack of thought and consideration.
- Development will place further pressure on the AONB and it is a threat to the continued existence of the AONB. There are 8 other local authorities circling the AONB, each asking for 100-1500 homes. At this rate there will be no AONB left.
- The purpose of the AONB is not to support growth of the Reading area as the Council claims.
- Loss of trees/woodland will impact upon the AONB. Enhancement of woodland links and screening of the settlement edge will not mitigate against this. It will take years for new trees to grow.
- First incursion into the fringes of the Sulham Valley.
- Planning documentation requires compensatory measures for the loss of AONB or green areas adjacent to the AONB, eg. new parks, wildlife sanctuaries. There is no evidence of compensatory measures in the preferred options document.
- Any Landscape Assessment or Landscape Visual Impact Assessment carried out must be adhered to in order to minimise impacts on the landscape.
- Not sufficient positive sustainability impacts to justify consideration of the site within the Landscape Capacity Assessment (2014).
- Recommendations within the Landscape Capacity Assessment Final Phase 2 Report questioned.

Council response

The Council's Landscape Character Assessment, carried out for all sites adjacent or within the AONB, indicates that development on this site, subject to the mitigation measures set out in the report, will not cause harm to the special qualities and character of the AONB. Where a site was assessed as causing harm to the AONB it has not been included within the Preferred Options DPD.

The LCA has considered the cumulative impacts of the sites in the Eastern Urban Area, and concerns are raised about the proximity of EUA003/EUA008 and EUA031 as there is a risk of a cumulative impact on Vicarage Wood and the rural character of Long Lane and the Berkshire Circular Route. Of these two sites, development at EUA003/EUA008 is preferred.

Topography

Consultation comments:

- Development will result in the overshadowing of existing houses.
- The site is one of the highest points in Tilehurst with views to the Goring Gap and Didcot, and higher than the adjacent AONB.
- Any development would be visible for a considerable distance.

- 2-3 storey homes or higher would be very prominent.

Council response

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 (Design Principles) of the Core Strategy and the Quality Design Supplementary Planning Document.

14. Minerals

Consultation comments:

- The site is within a “Mineral Consultation Area” which suggests that this is to safeguard the minerals present on the site.
- Although not stated for this site, it is believed that the potential for the “use or prior extraction” of this gravel will become relevant for this site. Is this site being put forward only for the purpose of providing dwellings or is it also being used by West Berkshire Council to fulfil Department of Environment quotas relating to the extraction of mineral resources, in this case gravel?

Council response:

The site is not within a preferred area for mineral extraction; however it is within a mineral consultation area. The site is underlain with gravel, which gives the potential for use or extraction prior to development of the site, which needs to be considered prior to development of the site in line with policies 1 and 2 of the Replacement Minerals Local Plan. It may be that it is not appropriate to extract the gravel, but consideration needs to be given to the potential. The site has not been submitted to the council for mineral extraction.

15. Personal

Consultation comments:

- Impact of development/loss of field on physical and mental health, well-being and quality of life.
- Impact of development upon the attraction of area.

Council response:

Policy CS14 (Design Principles) of the Core Strategy requires that all new development must make a positive contribution to the quality of life in West Berkshire. All development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), which consider the likely significant

effects of the policies and proposals on social, environmental, and economic factors. All sites have been subject to SA/SEA and where a significant negative impact has been identified a site has not been taken forward.

All new development will be required to be designed to reflect the character of the existing residential areas; therefore, there should be no impact on the attraction of the area.

16. Pollution

Consultation comments:

- Development will not reduce pollution.
- Urban sprawl contributes to climate change.
- An increase in pollution will impact upon health.
- Traffic will increase noise and air pollution.
- There will be noise during the construction period and this will impact on those who work from home.
- Light pollution will lead to a reduction of views of the sky at night and impact on ecology.
- Trees mitigate against air pollution and buffer noise and light pollution.
- The area is a green lung for Reading.
- The Council does not pick up litter along Long Lane and Sulham Hill.

Council response:

The site promoters have submitted a geo-environmental assessment which concludes that there are no significant issues that would prevent the site from being redeveloped for residential use.

All development proposals will be expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 (Sustainable Construction and Energy Efficiency) of the Core Strategy.

All street lighting will need to be designed in accordance with the guidance set out in the Council's Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution. The Ecological Assessment submitted by the Site Promoter for EUA033 highlights the potential impacts of light pollution on wildlife and sets out recommendations for careful planning of lighting during construction and as part of the development design.

It is unlikely that development of the site would have a significant effect on noise pollution levels. The adjacent ancient woodland is not designated a SSSI. National Planning Practice Guidance states that noise has no adverse effect so long as the exposure is such that it does not cause any change in behaviour or attitude, eg.

turning up volume of television, speaking more loudly, having to close windows, sleep disturbance.

A certain amount of noise is to be expected in most types of construction and cannot be completely prevented. The Council can serve a notice imposing requirements as to how construction works should be carried out to minimise noise and disturbance. The notice can cover working hours and noise limits.

The issue of litter along Long Lane and Sulham Hill is not a matter for consideration within this DPD.

17. Settlement boundaries

Consultation comments:

- Development will breach the settlement boundary.
- Redrawing settlement boundaries sets a precedent and goes against the purpose and value that they provide. There is potential for indefinite urban sprawl.
- Paragraph 6.8 of the preferred options document states that settlement boundaries within the Eastern Urban Area will be redrawn around the developable boundaries of sites included within the submission version of the Housing Site Allocations DPD. However, paragraph 2.11 of the preferred options documents states that the settlement boundaries will be re-drawn to include the proposed site allocations. Which is correct?
- The area beyond the existing settlement boundary is the same in type as the site, with no true greenbelt.
- The settlement boundary protects the residents of Tilehurst Parish from over population and protects small areas of green space left within the parish.
- It is unacceptable to redraw settlement boundaries to meet Government housing number criteria. A more thorough investigation should have been carried out to identify more suitable and appropriate sites.
- Any changes to the settlement boundary should be done with the consent of the community, not to suit the interests of MPs or their sponsors.
- The westward expansion of Tilehurst breaches a boundary that has been fixed for decades. This is contrary to paragraph 21 of Planning Policy Statement 7.
- The current settlement edge is already screened from Sulham Hill, except the gate into the field. There does not need to be the development so that the screening of the new settlement edge can be added.

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation. The site is not located within statutory greenbelt. No such designation exists within West Berkshire.

18. Sustainability

Consultation comments:

- Sustainability of proposals questioned.
- Unsustainable proposal due to lack of consideration of the impact on the existing and future population.
- Development would have a significant adverse environmental, social and economic impact.
- Sustainability should be defined from economic, environmental, social and community viewpoints rather than those of the prospective developer.
- No development is sustainable until a developer funds independent ecological, hydro and other required reports before a plan is submitted and those harmed are compensated.

Council response:

All sites have been subject to a Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) which considers the environmental, economic and social impacts of development of a site on a consistent basis across all sites. The assessment of this site did not result in any significant impacts on sustainability.

19. Comments from the site promoter

General

- There is no public access to the site
- The site is available and deliverable within the plan period
- The site is under option to Horstonbridge Tilehurst Limited, who are working with Darcliffe Homes
- Development of 30 dwellings is accepted and agreed as an appropriate scale of development for the site.

Ecology

- An extended Phase 1 Habitat Survey has been prepared for the site.
- Existing trees and hedgerows will be retained where possible
- New planting associated with the development will seek to maintain, and where appropriate, enhance, the existing ecological value of the site and provide appropriate linkages and corridors to the Local Wildlife Sites in the surrounding areas.
- Appropriate buffers will be provided between the ancient woodland and new development.

Flooding

- Wet conditions are a result of natural overland flows and will be taken into account in the site layout.
- Mitigation, including sustainable infiltration and attenuation techniques will be provided
- The surface water drainage strategy will include a 30% allowance for climate change.

Highways and Transport

- Traffic flow and speed surveys have been undertaken
- Limited trees will need to be removed to allow access and provide visibility splays. Replanting would take place
- The Transport Assessment indicates that the widening of Long Lane to provide safe access is not required
- A new footway is proposed to link the site to the existing footway along Long Lane
- A new pedestrian link would be provided to link the site to the existing urban area

Landscape

- An LVIA has been carried out and concludes that the site has a high degree of visual enclosure and sensitive development could be accommodated
- There are no views towards the AONB, nor is the site visible from the AONB
- The limitation on development to below the 90m contour does not appear to be justified
- It seems inappropriate to seek to fix the limit of development, or location and scale of landscape buffers at this time. These can be dealt with at planning application stage

Minerals and Waste

- The site is not within a preferred area of mineral extraction, therefore it is unlikely that gravel extraction on the site would be supported

Riding Stables

- The Equestrian Centre occupies the land under a tenancy agreement which includes a requirement that any grazing land lost to development be replaced with suitable alternative facilities.
- The landowner has significant landholdings within the area and can therefore provide alternative and suitable replacement sites for grazing within close proximity to the stables. That land would be on the west side of Sulham Hill, and would remove the current need for horses and their riders to cross and travel along Sulham Hill, a significant safety advantage. The development of the site will not adversely affect the activities offered by the Equestrian Centre or undermine the viability of the business.

Council Response

Comments Noted.

There is significant concern regarding access to the site. The Council require that should the site be allocated for development improvements are made to widen Long Lane, and improve visibility at the junction of Long Lane and Sulham Hill. Flooding on Long Lane is also a concern. The Council are content that Long Lane is suitable for the current level of traffic, but any additional traffic and access points onto the road would require an engineering solution to solve the flood risk as a result of surface water flows from Sulham Woods.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA035: 72 Purley Rise, Purley-on-Thames

Responses received: 53 – 15% of which (8 responses) were template responses. Two different templates were received, neither of which specifically relate to this site, although within some of the responses specific mention of EUA035 had been made:

- EUA003 008 031 033 template (1)
- EUA003 008 031 033 template (3)

1. Principle of development

Consultation comments:

- Pincents Hill has previously been rejected
- Development of this site would lead to Island Development
- Development should be built up, not out

Council response:

For the Council response on Pincents Hill – please see site EUA007.

Site EUA035 is well related and adjacent to existing residential development.

The housing type and mix of any development needs to comply with policy CS4 of the Core Strategy, having regard for the character of the surrounding area.

Housing allocation

Consultation comments:

- The Eastern part of the district is being asked to shoulder a disproportionate number of homes, while other settlements are getting off very lightly (eg. Thatcham)
- Existing overcrowding in Tilehurst

Council response:

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement

of approximately 1,000 dwellings. In comparison the Eastern Urban Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings.

The site is located in Purley-on-Thames, rather than Tilehurst.

Land use

Consultation comments:

- Use of brownfield land for new development should be considered before using greenfield sites
- Use of empty offices (Green Park, Theale Business Park , Arlington Business Park) for residential uses
- Loss of greenfield land

Council response:

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing.

A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

2. Coalescence of settlements

Consultation comments:

- Loss of strategic gap between settlements
- Merger of settlements
- Precedent set for future development towards Pangbourne

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of our Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

3. Ecology

Consultation comments:

- Loss of trees protected by TPOs
- Development will impact on local wildlife

Council response:

There are no trees on the site protected by TPOs.

The site has been assessed by the Council's ecologist, who has not raised any concerns regarding ecology, however has advised that when ecological surveys are undertaken, some trees and hedges may prove to be worth keeping, although this is not expected to preclude against the supply of approximately 34 dwellings.

Green Infrastructure and landscape mitigation measures, along with a small developable area, will reduce the impact on ecology.

4. Flood Risk

Consultation comments:

- The site is on a flood plain

- The area is prone to flooding and development will make this worse

Council response:

The site is at low risk of flooding; a site in flood zone 1 is at the lowest risk of flooding. Sustainable Drainage systems (SUDs) would need to be provided to reduce the risk of surface water flooding.

5. Gypsies, Travellers and Travelling showpeople

Consultation comments:

- Residents are being helped to ransom with the site being proposed for either 34 dwellings or a traveller site
- Do not wish the site to be used for Travellers

Council response:

The site was submitted to the Council with potential for either a site for Gypsies and Travellers or for housing. The site was assessed by the Council as being suitable for housing and therefore, is not being considered as a site for Gypsies and Travellers.

6. Heritage

Consultation comments:

- Development is unlikely to impact on Purley Hall (property 31)

Council response:

Comment noted.

7. Highways & Transport

Consultation comments:

Access to the site

- The access is on a bend on the A329
- Proximity to Westbury Lane onto the A329
- The proposed access road itself is narrow
- Access from Westbury Lane would require demolishing existing dwellings

Council response:

Adequate access to the site from/to the A329 can be provided. The site promoter has confirmed that access of 7.8m (as required by the Council) can be provided to the site.

Highway Network/traffic

Consultation comments:

- Increased traffic congestion in the local area
- Increases in traffic levels will impact on air quality and noise levels
- Opening up of Pincents Hill to the north would cause additional traffic issues to the north of Tilehurst
- Speeding traffic in the local area
- Existing road widths are too narrow
- Traffic outside schools at drop off/pick up times
- Use of local roads as rat runs to avoid traffic and congestion on the main roads (Fairford Road)
- Development estimated to have 20 vehicle movements during the am peak this is not considered significant

Council response:

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options site would have on the highway network. While there is no detailed modelling available for this site, the size of the site is unlikely to lead to significant traffic impact on the local road network. A Transport Statement (TS) would be required to accompany a planning application for the site, as well as a Travel Plan setting out measures to encourage alternative modes of travel to the car.

Traffic outside schools is recognised to be an issue across the district. The Council works with schools to develop and deliver travel plans to encourage and support pupils to walk and cycle to school.

Road Safety

Consultation comments:

- Impact on road safety of more vehicles and more congestion
- The A329 is already a dangerous road
- Fatal accident on the A329 close to this site

Council response:

Road Safety improvements would be considered as part of the Transport Statement submitted at the time of a planning application for the site.

It is noted that there has been a fatal accident on the A329 close to the site; however, this was not as a result of the road itself.

Public Transport

Consultation comments:

- Limited services with infrequent buses in the area
- Limited links to services/facilities, especially by public transport
- The site is close to Tilehurst and Pangbourne Railway stations
- Purley Rise has an existing bus route
- Pressure on existing Reading Buses services
- The site is adjacent to the railway line

Council response:

There are regular public transport services throughout the Eastern Urban Area, provided by Reading Buses. A 2 hourly service passes the site itself, with a number of other bus routes passing within 1km of the site. The site is approximately 2.5km from Tilehurst and Pangbourne Railway Stations. This is just over the CIHT's acceptable walking distance for Commuting of Travel to School of 2km (CIHT, 2000); however, it is within cycling distance.

Walking and cycling

Consultation comments:

- There are good opportunities for walking and cycling to link to services and facilities
- Narrow pavements and lack of cycle routes make walking and cycling difficult, especially to encourage walking/cycling to school
- Development of the site would not improve travel choice

Council response:

There are good walking and cycling links from the site into Reading and Pangbourne, including a number of off road routes using the Right of Way network.

8. Housing type and mix

Consultation comments:

- Development should be medium density
- The site could be used for supported living/retirement accommodation
- Need for smaller homes/starter homes in the area

Council response:

All development would need to be in line with CS4 of the Core Strategy which sets out the Council's policy on housing type and mix.

9. Infrastructure

Consultation comments:

- Facilities provided by West Berkshire Council are poor in this area
- Recent development by West Berkshire Council has placed pressure on facilities and infrastructure and local facilities will struggle to cope with additional development. A significant number of additional houses have been built in Purley, particularly on Long Lane, and no further amenities have been added to the village in this time.
- Needs to be greater focus on the infrastructure and local services that will be required to sustain further development. It was also noted that there are not enough facilities to cope with development.
- West Berkshire Council cannot cope with the demands of the area.
- Access to services cannot be demonstrated due to infrequent local bus service, path is too close to oncoming, fast traffic, debris accumulates on the path, and cycling has its dangers.

Council response:

Existing pressure on local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Education

Consultation comments:

- Do local schools have the available capacity?
- Local schools are already oversubscribed or have very few spare places and therefore could not support additional development.
- Pangbourne and Long Lane Primary Schools are full with Pangbourne Primary School now being full in Key Stage 1 with children who live in the catchment area.
- Development would place pressure on Little Heath School and Denefield Secondary School.
- No guarantee of school places for the children of the families that occupy the new development.
- Currently a big pressure on primary school places in West Berkshire and in neighbouring Reading Borough, with many schools accepting bulge year groups or being required to expand. This pressure will shortly feed in to the secondary school system and further measures will need to be taken to accommodate this expansion in pupil numbers. Sites should not be assessed in isolation from one another, without looking at the impact on the whole area.
- Lack of school places coupled with limited public transport, danger of cycling, difficulties of walking along a main road and the pavement to Pangbourne being regularly overgrown will result in children being taken to school by car and the carbon footprint increasing.
- Lack of consideration given to the extent of large scale schemes. These would need extra schools.
- Plans recently submitted for 50 dwellings on a site along the Oxford Road. This in combination with development of site EUA035 would create additional demand.
- Development will have a negative impact on schools. Schools are already beset by problems.
- Doubt that extra resources would be provided to accommodate additional residents. This will lead to a decline in an already overstretched education system.

- A safer site/area to ensure needs are met might well be the a site in Goosecroft Lane which has the nearness of all schools and play area facilities already in place and appears better placed to accommodate the proposed needs of the community.

Council response:

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Medical Services

Consultation comments:

- Do local doctors have the available capacity to cope with an increased population?
- Lack of doctors to support development. Further housing will compound already oversubscribed doctors. Pangbourne Surgery is the local GP surgery and the impact of how it would cope with an increased number of patients would need to be considered.
- Development would result in a faster growth in numbers on medical waiting lists in a period when the number of doctors are falling
- Is there a need for a GP surgery in Purley especially if all the proposed development within the area is granted? There are no Health Centres in Purley and residents have to travel to Pangbourne. Because it is considered to be within the NHS remit of prescription dispensing in Pangbourne and surrounding area, the ill and vulnerable are forced to walk to the Pangbourne because they cannot use the health centres facility at Pangbourne.
- Significant number of houses recently built in Purley on Thames, particularly on Long Lane. No further amenities have been added to the village in that time.
- Lack of consideration has been given to the extent of such large scale schemes which would need extra doctors.
- Development will have a negative impact on doctors
- Public transport is limited. Doctor's surgeries can be found in Pangbourne and Tilehurst and a car is essential to access these.
- Not enough hospitals to cope with an increase in housing in this area
- Do local dentists have available the capacity for an increase in patients numbers as a result of development?
- Public transport is limited and main means of access is by car. Dentist surgeries can be found in Pangbourne and Tilehurst and a car is essential to access these.

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP), working in partnership with service providers.

Leisure facilities

Consultation responses:

- Not enough leisure facilities to accommodate an increase in housing in this area
- Cotswold Gym equipment and surroundings are poor

Council comments:

Comments noted.

Local shops/Post office

Consultation comments:

- A number of previous applications to develop the site at 72 Purley Rise was been turned down. The situation has not changed to justify acceptance of a plan which involves several new houses. A significant number of new houses have been built in Purley-on-Thames, particularly on Long Lane. No further amenities have been added to the village in that time. Villagers are required to travel to Pangbourne or Tilehurst to do shopping beyond the local convenience store.
- There is only one shop in Purley which if there are many more people would not be adequate.
- Post office is within walking distance but limited stock of goods so residents will use cars for shopping.

Council response:

The post office and village shop is located close to the site. There is nothing to stop a private company submitting an application to the council to provide new shopping facilities within Purley-on-Thames. The site is 2.5km from Pangbourne which has a good range of shops and services, as well as being close to the shops and services in Reading itself.

With the rise on online shopping and supermarket delivery services, the proximity of a site to a local shop is of less importance that it may have been in the past.

Utilities

Consultation comments:

- Further housing will compound the existing sewage systems

Council response:

Consultation has taken place with Thames Water. They have not raised any concerns regarding development of the site in terms of water supply or waste water services.

10. Landscape/Setting

Consultation comments:

- Setting of the site is predominantly rural, it is not an urban area
- Encroachment into the countryside
- Change in character of the area
- Impact on AONB

Council response:

The site is located within the Eastern Urban Area as set out in the Core Strategy. It forms part of the urban area of Calcot, Tilehurst and Purley-on-Thames.

A Landscape assessment has been carried out for the site given the proximity to the AONB. This indicates that part of the site is suitable for development, subject to certain mitigation measures as set out in the report. Where a site has been considered to cause harm to the AONB it has not been included within the Preferred Options DPD.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD.

11. Settlement boundary

Consultation comments:

- Development is outside the settlement boundary

Council response:

The Core Strategy is clear that housing sites will need to be allocated outside the settlement boundary to meet the district's housing requirement.

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from

development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation

12. Comments from the site promoter

- 1.2ha sites with potential for 34 dwellings (a density of 28dph). Such a density would not cause harm to the local character of the area
- The site is located behind the existing ribbon building line
- Current caravan storage on the site would cease
- Potential for a mix of dwellings sizes and types, including affordable housing, with potential for bungalows.
- Keen for self-build opportunities to be allowed for on the site
- The site is well placed to take advantage of the existing infrastructure in Purley and to gain links to wider facilities and services available in Pangbourne and Tilehurst/Greater Reading as it is located close to the A329 where there are bus services and wide usable pavements
- The proposal to spread development around a number of modest development sites is to be welcomed. A distribution strategy relying on a small number of very large development sites would result in significant pressure on a limited number of settlements. With few allocations, particularly in the large towns there could be a risk of market saturation, or creation of significant infrastructure demand that could undermine housing delivery
- There is not at high risk of flooding, and the underlying bedrock is chalk, so there is no reason for drainage to be problematic.
- The site is well placed to take advantage of Purley's existing infrastructure
- The access to the site is 5.9m at the narrowest point. This is within the Manual for Streets guidance for lightly trafficked streets, which states access should be 4.8m to allow cars to easily pass. A similar approach has been taken with the recently approved development at 1057 Oxford Road.
- Appropriate sight lines can be provided
- The land to the east of the site is within the landowners control and could be made available for access should the site be allocated and additional land required.

Council response:

Comments noted.

Manual for Streets road width does not include the provision of pavements (or verges). A 1-2m pavements/grass verge is required on either side of the access road, which brings the required access width to at least 6.8m (4.8m road, plus two 1m pavement/verges on either side). The Council's preferred width is 8.8m as this allows for a 2m pavement/verge on either side of the road.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA025: Land adjacent to Junction 12 of M4

Responses received: 101

Template responses received: 30 (30% of all responses), based on three individual templates

- EUA007 template (1)
- EUA003 008 031 033 template (1)
- Letter supporting comments made by Mr E I Savage (hsapo 6448)

1. General

Consultation comments:

- Development should take place in less densely populated areas with less traffic and more Greenfield land
- Already densely populated area
- Unknown impact of IKEA, particularly on traffic
- Believe the site is owned by Englefield Estate
- Home owners are not interested in sustainable development
- Has an independent review of the area, flooding, pollution, traffic and infrastructure been completed?
- Threat of legal action
- Loss of tranquillity
- Consider use of the site for a wind turbine

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Spatial Area. Each spatial area has its own housing requirement to be delivered. The core strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Spatial Area would be able to take the amount of development proposed.

It is acknowledged that there are currently some unknowns regarding the traffic impact of IKEA. A Transport Assessment was submitted alongside the planning application for IKEA. This was considered acceptable by the Council, subject to the mitigation measures to be provided. The details from this TA have been included in the Council's Housing Site Allocations DPD Transport Assessment work; therefore, the traffic impact from IKEA has been taken into account with regards to this site.

The site is not owned by Englefield Estate.

The National Planning Policy Framework (NPPF) requires development to contribute to the achievement of sustainable development. This is assessed through the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process.

The Housing Site Allocations DPD will be subject to a formal period of consultation and following this it will be submitted to the Secretary of State for examination. The Examination process provides an independent review that all proposals in the plan are based on sound evidence, which will include a review of the Council's evidence on flooding, traffic etc.

The independent inspector's role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Objector's views are considered and debated through this process.

The Council will not submit the plan to the Secretary of State for examination unless it considers that the plan is sound and meets the tests above, and that the Duty to Cooperate, legal and procedural requirements have been met.

The Core Strategy encourages the use of renewable energy on new sites. It would be up to the landowner to suggest potential sources of renewable energy.

2. Principle of development

Consultation comments:

- There is a covenant on the site (item for of title number BK212859, Nov 1983) preventing development on the site
- Planning policy should allow for building upwards, rather than sprawling into the countryside
- Development should not take place until IKEA has been completed to allow for the impact to be assessed
- Mixed use on the site would lead to even more traffic in the area
- Setting precedent for the Prudential site between J11 and 12 of the M4

Council response:

The area of the site covered by the covenant is a small area to the south of the site adjacent to the properties on Salfour Drive and Bainbridge Road; it does not affect the proposed developable area.

The sites set out in the Preferred Options DPD are based upon sites promoted to the Council for inclusion in the Strategic Housing Land Availability Assessment (SHLAA). The sites included in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While other sites may be available, these may not have been submitted to the Council through the SHLAA (eg. the prudential site between J11 and J12 of the M4) or are not in accordance with the Spatial Strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

Housing allocation:

Consultation comments:

- 1984 planning consent for Kennet Meadows designates that area outlined in red on the Parish Council flyer as not having dwellings erected, and an approved sound barrier installed – since then traffic has worsened and therefore, the requirement has greater relevance
- Development should take place when schools shops, doctors and good transport links are incorporated into the plans
- Smaller developments should be scattered across the whole area

Council response:

Any development of the site would need to be informed by noise and air quality surveys which would advise on appropriate mitigation measures, given the proximity of the site to the M4, the A4 Bath Road and the railway. The design of the site would also be required to take these issues into account.

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified on a range of factors, including sustainability and number of services and facilities available.

The site is located close to local services and facilities, with the Calcot retail area opposite the site. There are good transport links close to the site, with Theale Station 1.7km from the site, which is within the acceptable walking distances (CIHT, 2000) for commuting and travel to school. There is also a significant bus interchange, including National Express services, at the Calcot retail area.

The Housing Site Allocations DPD looks to allocate developing in accordance with the Core Strategy's Spatial Strategy; therefore, small developments across the whole district would not be in accordance with the Core Strategy policy.

Land use:

Consultation comments:

- Brownfield land should be considered for housing as a priority unless they are immediately going to be used for job creation

- Use of empty offices for flats (Green Park, Theale Business Park, Arlington business park)

Council response:

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement, development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocations DPD. There is not currently a surplus of employment land that could be released for residential development.

Alternative options:

Consultation comments:

- Development should take place in less congested areas – along the A4 west of Theale
- More suitable areas along the A4 between Calcot and Thatcham
- Plenty of undeveloped/underdeveloped land on the other side of the M4 between the M4 and the residential area of Theale
- Develop the area to the west of Theale that has been earmarked for development for years without any foundations being laid
- Development should take place nearer Newbury, this area suffers enough from being disregarded
- Extra windfall sites should be considered
- Empty homes should be brought back into use
- Conversion of non residential buildings into residential properties
- Sites in Thatcham should be considered

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and selected from the sites promoted to the Council in the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy. While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement of approximately 1,000 dwellings. In comparison the Eastern Urban Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings.

A windfall allowance has been taken into account when calculating the remaining housing requirement for the district.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing.

3. Coalescence of settlements

Consultation comments:

- Loss of strategic gap between settlements
- Development at Pincents Hill was rejected at appeal for various reasons – transport, landscape and closure of the strategic gap between Reading and Theale
- Loss of spatial distance between communities of Calcot and Theale – against West Berkshire’s planning strategy

Council response:

The ‘gap’ policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation ‘strategic gap’ or ‘local gap’ therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of our Core Strategy strategic objectives states ‘to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire’s towns, villages and countryside’ and this approach is taken forward in policy CS19.

4. Ecology

Consultation comments:

- Impact on wildlife (deer, birds, bats, small mammals, invertebrates, reptiles, badgers, foxes)
- Impact on water voles
- Loss of wildlife has already been seen by the A4 widening project
- Trees have been planted and the field sown with grasses and wild flowers to make a meadowland on the site

Council Response

Initial screening of all the sites has taken place by the Council's ecologist, who has advised that if this site goes forward as an allocation, the undeveloped land should be handed over to West Berkshire Council as an extension to Holybrook Linear Park. A SSSI assessment would not be required as residents would need to cross the busy A4.

The site is currently in environmental stewardship, mitigation measures to recreate the habitats lost by development would be required, together with an extended phase 1 habitat assessment should the site be taken forward for allocation.

5. Flooding

Consultation comments:

- Recent planning consent for Kennet Meadows required ground floors to be 45.25m about AOB to reduce flood risk
- Close to flood plain
- Development will result in less land for water absorption which will make flood risk worse
- Last year flooding was experienced in the area
- The ditch at the bottom of the fields has been cleared, including the felling of trees, to stop the industrial estate flooding – more housing is likely to make this worse
- Good to see the site area has been reduced to exclude the area that floods
- Some houses in the area flooded for the 1st time in 2014
- The EA suggest that only part of the site is allocated due to flood risk on the southern part of the site. Recommended that should the site be allocated the site policy states that there will be no development in Flood Zone 2
- The site acts as a natural drain for flooding protecting the houses on the existing estate
- Poor drainage on the site
- The site is in a groundwater flooding location

Council response:

It is recognised that parts of the site suffer from flooding and in line with Environment Agency guidance no development will take place within the flood zone. This will be set out in the site policy should the site be allocated for development. A flood risk assessment for the site would be required, which would need to include details of

sustainable drainage systems (SUDs) to be provided on the site, this could include flood proofing of properties by raising the flood level.

6. Highways and Transport

Highway network/traffic

Consultation response:

- Significant congestion on local roads near this site in peak hours
- Already have issues getting out of the estate at the Sainsbury's roundabout
- Dorking Way and Charrington Road are used for rat running
- Of all the sites considered this is the closest to the M4
- The A4 is the only way to leave the parish and is heavily congested
- Majority of new home owners have at least one car
- A4 widening will not resolve the issues in the long term
- Difficulties getting out of Charrington Road onto the A4
- Traffic impact from IKEA
- 125 homes would lead to 200-250 additional cars
- Consultation has been carried out into rat running through the estate south of the A4
- Traffic calming measures do not work
- Improvements to J12 and the Sainsbury's roundabout for IKEA will not prevent significant congestion in the area
- Impact on road safety for vulnerable people
- Road widths should be wider
- A Transport Assessment/Statement would be required and should assess Junction 12 of the M4, the Sainsbury's roundabout and the junction with Langley Hill
- Likely to be a significant number of additional journeys added to Reading's road network, mitigation should be provided
- Likely that improvements will need to be made to J12

Council response:

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites will have on the highway network. The TAs indicate that development of the sites themselves is unlikely to have a significant impact on the highway network, meaning there will be limited impact on local congestion. The TA work for the Calcot area takes into account the development of IKEA, based on the original larger scheme, therefore, providing a worst case scenario for traffic impact on the A4.

The proposed highways mitigation measures associated with IKEA will replace the A4 Bath Road/ Pincents Lane / Dorking Way roundabout with a traffic signal junction, and vehicles will be unable to turn right from Dorking Way on to the A4. This will need to be taken into consideration in any TA work carried out by the site promoters should the site be allocated, and is considered in the Council's TA work.

Survey work has been carried out in to rat running in the area. There is evidence of rat running, and a number of options for reducing it were subject to consultation in the summer of 2014. It was decided, due to a very low response rate, that the situation would be reviewed following the completion of the A4 widening improvements.

Any planning application would need to be accompanied by a TA, which would consider the impact of the development on specific local junctions. It is at this stage that improvements to junctions, and road safety would be proposed. A Travel Plan, setting out measures to encourage alternative modes of travel to the car would also be required.

The improvements to the A4 (dualing), and the proposed Smart Motorway scheme for the M4 (Junctions 3 – 12) aim to improve traffic flow and journey time reliability. Smart Motorways help relived congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limited to keep traffic moving smoothly. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth. Consultation has taken place with Highways England, who have said that the site may be required as part of the works compound during the initial phases of the delivery of the Smart Motorway scheme, which could have an impact on the phasing of the site, but does not prevent the site coming forward later in the plan period.

Public transport

Consultation comments:

- The site was previously considered for a park and ride site – this was overturned
- Trains are Expensive
- Trains provide a limited services
- Would be better to move the coach/bus area from the site to this site to give a more friendly coach way
- Theale station is 1.3 miles away and Tilehurst station is 3.2 miles) this will result in reliance on the car
- Increased demand for public transport (run by Reading Transport) mitigation should be provided

Council response:

There are regular public transport services throughout the Eastern Urban Area, provided by Reading Buses; the main bus interchange for the area is located opposite the site at the Calcot retail area. An increase in population often results in improvements to bus services and this would be negotiated as part of any planning application.

Theale Station is within the CIHT's acceptable walking distance for commuting or travel to school, being approx. 1.7km from the site (acceptable walking distance is 2km).

West Berkshire Council is no longer perusing a park and ride site. Instead Theale station is being promoted as a park and rail site through the Local Sustainable Transport Fund. Improvements to the station, including the provision of a lift bridge, and new ticket office have begun.

Rights of way

Consultation comments:

- Loss of public right of way

Council response:

There is no public right of way across the site.

7. Infrastructure

Consultation comments:

- Decline in local shops and businesses
- Reliance on services/facilities in Reading
- The council should be providing more doctors and schools not more houses
- No post office in Calcot, the nearest one is in Theale
- Developments are not close to local centres of amenities (post office, libraries, leisure centres etc.)
- There are no services/facilities in Holybrook parish (Shops, post office, surgeries)
- Unequal distribution of services/facilities across West Berkshire – this area has fewer than other areas of West Berkshire
- Doctors/schools pressure should be resolved before more housing built

Council response:

Existing pressure on local services and facilities is recognised (Schools, doctors etc.) The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the social, environmental and physical infrastructure that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

The Council is not a direct provider of many types of infrastructure so works in partnership to enable this to come forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide

infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

The site is opposite the Calcot retail area which contains a number of shops including an extensive Sainsbury's. While the retail area may not be within the same parish as the site, it is within easy walking distance. The nearest post office to the site is in Theale.

Education

Consultation comments:

- Reading schools already struggle to provide preferred places for local children
- Pressure on Denefield and Little Heath Schools
- Additional pressure on schools will lead to a decline in the education system
- Lack of new schools will mean parents having to travel miles to get their children to school

Council Response

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Medical services

Consultation Comments

- GP surgeries already struggle with the number of patients they have
- Recent closure of a local doctors have put additional pressure on other surgeries in the area
- Pressure on dentists
- Pressure on GPs is making people travel to A&E/minor injuries for medical assistance

Council response

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP).

Emergency services:

Consultation comments:

- Relocation of the Fire and Rescue service to Pincents Lane will be affected as they require good access to the M4/A4

Council response:

The relocation of the Fire and Rescue service HQ to Pincents Lane has already taken place. The fire station itself remains at Dee Road, until an alternative location can be found.

Utilities

Consultation comments:

- High voltage cables cross the site
- Thames Water main supply pipe runs through the site
- Pressure on water supplies

Council response:

Thames Water has raised concerns about water supply capability and waste water services in relation to the site. A water supply strategy and drainage strategy would be required as part of any planning application should the site be allocated, to inform provision. This would be included as a policy requirement.

The Thames Water pipeline runs along the northern boundary of the site and is not anticipated to impact on the deliverability of the site. Its location would need to be taken into account by the Site Promoter at the detailed design stage.

Consultation has been carried out with National Grid, who has not raised any concerns regarding development on the site.

Recreation/open space

Consultation comments:

- Loss of recreation space
- Concern in relation to over-looking and child safeguarding
- No swimming pool, bowling, ice-skating in the area
- The bowling alley was demolished to make way for IKEA
- No youth facilities

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. There is no official public access to the site and no rights of way cross the site.

Landscaping and green infrastructure would be required to be provided on the site in line with the Core Strategy's Green Infrastructure Policy C18. The requirements for these will be set out in the site policy, and full details would be required as part of a planning application.

The bowling alley was demolished to make way for IKEA, however as with any leisure facilities, there is nothing stopping a private company submitting a planning application for a new facility in the area.

8. Landscape/setting

Consultation comments:

- Too close to the M4/A4
- It is nice to pass an open field on the way into/out of the area
- The area was a green wedge left by planners/developers when the estate was built
- The area should be added to Linear Park to make inclusive parkland area with car parking in Dorking Way
- There is only limited green space left in Calcot
- Loss of countryside

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open space and landscaping, will be required in accordance with policy CS19 of the Core Strategy, however, there are no plans to include parkland within the site.

9. Personal

Consultation comments:

- Impact on health and wellbeing
- Impact on quality of life

Council response:

New development itself is unlikely to impact on health and wellbeing.

10. Pollution

Consultation comments:

- Noise due to proximity to M4
- Removal of trees along the A4 for the widening project has led to an increase in noise levels
- Air quality due to proximity to M4
- Impact on climate change
- Impact on water quality in the river

Council response:

All development is expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 of the Core Strategy.

Noise and air quality mitigation may be required on the site due to the proximity of the site to the M4. A noise and air quality survey would be required to accompany a planning application and this would be set out in any policy for the site.

Noise mitigation measures have been installed along the A4 as part of the widening works, which should reduce the noise impact from the road.

The Environment Agency has not raised any concerns regarding an impact on water quality in the river.

11. Settlement boundary

Consultation comments:

- Breaching settlement boundary leading to urban sprawl

Council response:

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

12. Comments from the site promoter

- The area of the whole site is 13.692ha; the PO states that the site could accommodate 50 – 100 dwellings at medium density. Development at the upper margins would result in a density of 7dph
- It is appreciated that parts of the whole site may not be suitable for development due to flood risk and mitigation measures, but 100 dwellings is a significant under estimation of the housing that could be delivered on the site
- The site is ideally suited for mixed use development, inc. Commercial and residential development at no less than 50dph. The site could achieve in excess of 250 units
- The site is highly accessible by road and public transport

Council response:

The Council are only looking at allocating part of the site for development, due to the proximity of the site to the motorway.

New developments need to be in keeping with the character of existing residential development. This includes taking into account the existing density of residential development. Development on Dorking Way is approximately 29dph.

The site is highly accessible by road and public transport with the Calcot bus interchange opposite the site and Theale railway station approximately 1.7km from the site.

Highways England has notified the Council that the site may be required as a site compound for the Smart Motorway scheme. This would impact on the phasing of the site, meaning that the site would not be able to come forward until slightly later in the plan period. This would be reflected in the site policy should the site be allocated for development.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

EUA026: Land adjacent to Bath Road and Dorking Way, Calcot

Responses received: 94

Template responses received: 30 (32% of all responses), based on three individual templates

- EUA007 template (1)
- EUA003 008 031 033 template (1)
- Letter supporting comments made by Mr E I Savage (hsapo 6449)

1. General

Consultation comments:

- Development should take place in less densely populated areas with less traffic and more Greenfield land
- Already densely populated area
- Unknown impact of IKEA, particularly on traffic
- Believe the site is owned by Englefield Estate
- Home owners are not interested in sustainable development
- Has an independent review of the area, flooding, pollution, traffic and infrastructure been completed?
- Threat of legal action
- Loss of tranquillity
- Consider use of the site for a wind turbine

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Spatial Area. Each spatial area has its own housing requirement to be delivered. The Core Strategy was found sound at an Examination by an Independent Inspector who agreed that based on the evidence provided the Eastern Spatial Area would be able to take the amount of development proposed.

It is acknowledged that there are some unknowns regarding the impact of the implementation of IKEA. A Transport Assessment was submitted alongside the planning application for IKEA. This was considered acceptable by the Council, subject to the mitigation measures to be provided. The details from this TA have been included in the Council's Housing Site Allocations DPD Transport Assessment work; therefore, the traffic impact from IKEA has been taken into account.

The site is not owned by Englefield Estate.

The National Planning Policy Framework (NPPF) requires development contributes to the achievement of sustainable development. This is assessed through the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process.

The Housing Site Allocations DPD will be subject to a second period of consultation and following this it will be submitted to the Secretary of State for examination. The Examination process provides an independent review that all proposals in the plan are based on sound evidence, which will include a review of the Council's evidence base on flooding, traffic etc.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The role of the Inspector is also to consider all of the consultation responses. The Council will not submit the plan to the Secretary of State for examination unless they consider that the plan is sound and meets the tests above, and that the Duty to Cooperate, legal and procedural requirements have been met.

The Core Strategy encourages the use of renewable energy on new sites. It would be up to the landowner to suggest potential sources of renewable energy on the site; the Council does not actively seek land for energy production.

2. Principle of development

Consultation comments:

- There is a covenant on the site (item for of title number BK212859, Nov 1983) preventing development on the site
- Planning policy should allow for building upwards, rather than sprawling into the countryside
- Development should not take place until IKEA has been completed to allow for the impact to be assessed
- Mixed use on the site would lead to even more traffic in the area
- Setting precedent for the Prudential site between J11 and 12 of the M4
- Red Cottage Drive - Previous general objection that requested land to be used for community services (eg. Doctors) – this was overturned and housing only granted permission

Council response:

The covenant relates to a small area to the south of the EUA025, adjacent to the properties on Salfour Drive and Bainbridge Road it does not affect this site.

The sites set out in the Preferred Options DPD are based upon sites promoted to the Council for inclusion in the Strategic Housing Land Availability Assessment (SHLAA). The sites put forward in the DPD have been assessed by the Council as the most suitable sites for development. In some areas, more sites have been forward than are required, meaning choices have to be made regarding which site or sites will finally be allocated. While other sites may be available, these may not have been submitted to the Council through the SHLAA (eg. the prudential site between J11 and J12 of the M4) or are not in accordance with the spatial strategy of the Core Strategy meaning that their allocation would not be in accordance with the Core Strategy policy.

The site is being promoted as a mixed use development, therefore, there could be potential for some community uses/facilities to be provided on the site.

Housing allocation

Consultation response:

- 1984 planning consent for Kennet Meadows designates that area outlined in red on the Parish Council flyer as not having dwellings erected, and an approved sound barrier installed – since then traffic has worsened and therefore, the requirement has greater relevance
- Development should take place when schools shops, doctors and good transport links are incorporated into the plans
- Smaller developments should be scattered across the whole area

Council response:

Development is focused around settlements within the Core Strategy Settlement Hierarchy. These settlements were identified on a range of factors, including sustainability and number of services and facilities available.

The site is located close to local services and facilities, with the Calcot retail area opposite the site. There are good transport links close to the site, with Theale Station 1.7km from the site, which is within the acceptable walking distances (CIHT, 2000) for commuting and travel to school. There is also a significant bus interchange, including National Express services, at the Calcot retail area.

The Housing Site Allocations DPD looks to allocate development in line with the Core Strategy's spatial strategy; therefore, small developments across the whole district would not be in accordance with the Core Strategy policy.

Land use

Consultation comments:

- Brownfield land should be considered for housing as a priority unless they are immediately going to be used for job creation
- Use of empty offices for flats (Green Park, Theale Business Park, Arlington business park)

Council response:

Where the Council are aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation. The Core Strategy made it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

A review of employment land will take place as part of the new local plan, which will follow the Housing Site Allocates DPD. There is not currently a surplus of employment land that could be released for residential development.

Alternative options

Consultation comments:

- Development should take place in less congested areas – along the A4 west of Theale
- More suitable areas along the A4 between Calcot and Thatcham
- Plenty of undeveloped/underdeveloped land on the other side of the M4 between the M4 and the residential area of Theale
- Develop the area to the west of Theale that has been earmarked for development for years without any foundations being laid
- Development should take place nearer Newbury, this area suffers enough from being disregarded
- Extra windfall sites should be considered
- Empty homes should be brought back into use
- Conversion of non residential buildings into residential properties
- Sites in Thatcham should be considered

Council response:

The sites put forward for allocation are in accordance with the spatial strategy set out in the Core Strategy, and based upon the sites promoted to the Council through the Strategic Housing Land Availability Assessment (SHLAA). Development is focused around settlements within the Settlement Hierarchy. While other sites may be being promoted along the A4 between Thatcham and Calcot, their allocation would be contrary to the spatial strategy of the Core Strategy.

The DPD is looking to allocate land outside the settlement boundaries of settlements within the settlement hierarchy of the Core Strategy. All sites within the settlement boundary (such as the Horncastle Ford site) have a presumption in favour of development and therefore, do not need to be allocated.

The east of the district has been allocated a relatively low level of growth compared with the other urban areas of the district (Newbury and Thatcham). Newbury as the main urban area in West Berkshire is the main focus for development through the Core Strategy, with a total housing requirement of 6,300. Two strategic sites have been allocated in Newbury totalling 2,500 dwellings, leaving a remaining requirement of approximately 1,000 dwellings. In comparison the Eastern Urban Area requirement from the Core Strategy is approximately 1,400 dwellings, with a remaining requirement of approximately 700 dwellings.

A windfall allowance has been taken into account when calculating the remaining housing requirement for the district.

Conversion of non-residential properties to residential uses can, in many cases, be done through permitted development. As many non-residential properties, such as offices, are within protected employment areas, it would be against current planning policy for the Council to allocate these sites for housing.

3. Coalescence of settlements

Consultation comments:

- Loss of strategic gap between settlements
- Development at Pincents Hill was rejected at appeal for various reasons – transport, landscape and closure of the strategic gap between Reading and Theale
- Loss of spatial distance between communities of Calcot and Theale – against West Berkshire’s planning strategy

Council response:

The ‘gap’ policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation ‘strategic gap’ or ‘local gap’ therefore no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states ‘to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire’s towns, villages and countryside’ and this approach is taken forward in policy CS19.

4. Ecology

Consultation comments:

- Impact on wildlife (deer, birds, bats, small mammals, invertebrates, reptiles, badgers, foxes)
- Impact on water vole
- Loss of wildlife has already been seen by the A4 widening project
- Trees have been planted and the field sown with grasses and wild flowers to make a meadowland on EUA025
- Proximity to Pincents Kiln SSSI, therefore a SSSI assessment should be carried out, and potentially a LVIA due to proximity to AONB

Council response:

Initial screening of all the sites has taken place by the Council's ecologist, who in respect of EUA026, has advised that there are no ecological concerns. The land has been cropped in the last 10-15 years and is not natural meadowland. A SSSI assessment is not required as residents would have to cross the busy A4. Mitigation measures to recreate the habitats lost by development would be required, along with an extended phase 1 habitat assessment should the site be taken forward for allocation.

5. Flooding

Consultation comments:

- Recent planning consent for Kennet Meadows required ground floors to be 45.25m about AOB to reduce flood risk
- Close to flood plain
- Development will result in less land for water absorption which will make flood risk worse
- Last year flooding was experienced in the area
- The ditch at the bottom of the fields has been cleared, including the felling of trees, to stop the industrial estate flooding – more housing is likely to make this worse
- Good to see the site area has been reduced to exclude the area that floods
- Some houses in the area flooded for the 1st time in 2014
- The EA suggest that only part of the site is allocated due to flood risk on the southern part of the site. Recommended that should the site be allocated the site policy states that there will be no development in Flood Zone 2
- The site acts as a natural drain for flooding protecting the houses on the existing estate
- Poor drainage on the site
- The site is in a groundwater flooding location

Council response:

The site is at low risk of flooding. There is a small area of surface water flood risk to the west of the site, along the boundary with Dorking Way.

A flood risk assessment, covering all sources of flooding, would be required to accompany a planning application. This would need to include details of sustainable drainage systems (SUDs) to be provided on the site.

6. Highways & Transport

Highway network/traffic

Consultation comments:

- Significant congestion on local roads near this site in peak hours
- Already have issues getting out of the estate at the Sainsbury's roundabout
- Dorking Way and Charrington Road are used for rat running
- Of all the sites considered this is the closest to the M4
- The A4 is the only way to leave the parish and is heavily congested
- Majority of new home owners have at least one car
- A4 widening will not resolve the issues in the long term
- Difficulties getting out of Charrington Road onto the A4
- Traffic impact from IKEA
- 125 homes would lead to 200-250 additional cars
- Consultation has been carried out into Rat running through the estate south of the A4
- Traffic calming measures do not work
- Improvements to J12 and the Sainsbury's roundabout for IKEA will not prevent significant congestion in the area
- Impact on road safety for vulnerable people
- Road widths should be wider
- A Transport Assessment/Statement would be required and should assess Junction 12 of the M4, the Sainsbury's roundabout and the junction with Langley Hill
- Likely to be a significant number of additional journeys added to Reading's road network
- Likely that improvements will need to be made to J12 to cope with

Council response:

The Council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites will have on the highway network. The TAs indicate that development of the sites themselves are unlikely to have a significant impact on the highways network, meaning there will be limited impact on local congestion. The TA work for the Calcot area takes into account the development of IKEA, based on the original larger scheme, therefore, providing a worst case scenario for traffic impact on the A4.

The proposed highways mitigation measures associated with IKEA will replace the A4 Bath Road/ Pincents Lane / Dorking Way roundabout with a traffic signal junction, and vehicles will be unable to turn right from Dorking Way on to the A4. This will

need to be taken into consideration in any TA work carried out by the site promoters should the site be allocated, and is considered in the Council's TA work.

Survey work has been carried out into rat running in the area. There is evidence of rat running, and a number of options for reducing it were subject to consultation in the summer of 2014. It was decided, due to a very low response rate, that the situation would be reviewed following the completion of the A4 widening improvements.

Any planning application would need to be accompanied by a TA, which would consider the impact of the development on specific local junctions. It is at this stage that improvements to junctions, and road safety would be proposed. A Travel Plan, setting out measures to encourage alternative modes of travel to the car would also be required.

The improvements to the A4 (dualing), and the proposed Smart Motorway scheme for the M4 (Junctions 3 – 12) aim to improve traffic flow and journey time reliability. Smart Motorways help relieve congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limited to keep traffic moving smoothly. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth. Consultation has taken place with Highways England, who have said that the site may be required as part of the works compound during the initial phases of the delivery of the Smart Motorway scheme, which could have an impact on the phasing of the site, but does not prevent the site coming forward later in the plan period.

Public transport

Consultation comments:

- The site was previously considered for a park and ride site – this was overturned
- Trains are expensive
- Trains provide a limited services
- Would be better to move the coach/bus area from the site to this site to give a more friendly coach way
- Theale station is 1.3miles away and Tilehurst station is 3.2miles) this will result in reliance on the car
- Increased demand for public transport (run by Reading Transport) mitigation should be provided

Council response:

There are regular public transport services throughout the Eastern Urban Area, provided by Reading Buses, the main bus interchange for the area is located opposite the site at the Calcot retail area. An increase in population often results in improvements to bus services and this would be negotiated as part of any planning application.

Theale Station is within the CIHT's acceptable walking distance for commuting or travel to school, being approx. 1.7km from the site (acceptable walking distance is 2km).

West Berkshire Council is no longer pursuing a park and ride site. Instead Theale station is being promoted as a park and rail site through the Local Sustainable Transport Fund. Improvements to the station, including the provision of a lift bridge, and new ticket office have begun.

Rights of Way

Consultation comments:

- Loss of public right of way

Council response:

There is no public right of way across the site.

7. Infrastructure

Consultation comments:

- Decline in local shops and businesses
- Reliance on services/facilities in Reading
- The council should be providing more doctors and schools not more houses
- No post office in Calcot, the nearest one is in Theale
- Developments are not close to local centres of amenities (post office, libraries, leisure centres etc.)
- There are no services/facilities in Holybrook parish (Shops, post office, surgeries)
- Unequal distribution of services/facilities across West Berkshire – this area has fewer than other areas of West Berkshire
- Doctors/schools pressure should be resolved before more housing built

Council response:

Existing pressure on local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

The site is opposite the Calcot retail area which contains a number of shops including a Sainsbury's. While the retail area may not be within the same parish as the site, it is within easy walking distance. The nearest post office to the site is in Theale.

Education

Consultation comments:

- Reading schools already struggle to provide preferred paces for local children
- Pressure on Denefield and Little Heath Schools
- Additional pressure on schools will lead to a decline in the education system
- Lack of new schools will mean parents having to travel miles to get their children to school

Council response:

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Medical services

Consultation comments:

- GP surgeries already struggle with the number of patients they have
- Recent closure of a local doctors have put additional pressure on other surgeries in the area
- Pressure on dentists
- Pressure on GPs is making people travel to A&E/minor injuries for medical assistance

Council response:

As referred to above, the requirement for additional medical services/facilities is picked up through the Infrastructure Delivery Plan (IDP).

Emergency services

Consultation comments:

- Relocation of the Fire and Rescue service to Pincents Lane will be affected as they require good access to the M4/A4

Council response:

The relocation of the Fire and Rescue service HQ to Pincents Lane has already taken place. The fire station itself remains at Dee Road, until an alternative location can be found.

Utilities

Consultation comments:

- Thames Water main supply pipe runs through the site
- Pressure on water supplies
- High voltage cables cross the site

Council response:

Thames Water has been consulted on the site and has not raised any concerns regarding water supply. The Thames Water pipeline runs along the northern boundary of the site and is not anticipated to impact on the deliverability of the site. Its location would need to be taken into account by the Site Promoter at the design stage.

Consultation has been carried out with National Grid, who has not raised any concerns regarding development on the site.

Recreation/open space

Consultation comments:

- Loss of recreation space
- Concern in relation to over-looking and child safeguarding
- No swimming pool, bowling, ice-skating in the area
- The bowling alley was demolished to make way for IKEA
- No youth facilities

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. There is no official public access to the site and no rights of way cross the site.

Landscaping and areas of public open space (which could include play areas and facilities for young people) would be required to be provided on the site in line with the Core Strategy's Green Infrastructure Policy C18. The requirements for these will be set out in the site policy, and full details would be required as part of a planning application.

The bowling alley way demolished to make way for IKEA, however as with any leisure facilities, there is nothing stopping a private company submitting a planning application for a new facility in the area.

In many cases a degree of overlooking helps to improve safety through passive surveillance.

8. Landscape/setting

Consultation comments:

- Too close to the M4/A4
- It is nice to pass an open field on the way into/out of the area
- The area was a green wedge left by planners/developers when the estate was built
- The area should be added to Linear Park to make inclusive parkland area with car parking in Dorking Way
- There is only limited green space left in Calcot
- Loss of countryside

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD. Green Infrastructure, including public open space and landscaping, will be required in accordance with policy CS19 of the Core Strategy, however, there are no plans to include parkland within the site. Given the proximity of the site to the M4 and A4, noise and air quality surveys will be required, to advise on necessary mitigation measures.

9. Personal

Consultation comments:

- Impact on health and wellbeing
- Impact on quality of life

Council response:

New development itself is unlikely to impact on health and wellbeing.

10. Pollution

Consultation comments:

- Noise due to proximity to M4
- Removal of trees along the A4 for the widening project has led to an increase in noise levels
- Air quality due to proximity to M4
- Impact on climate change
- Impact on water quality in the river

Council response:

All development is expected to minimise carbon dioxide emissions through sustainable design and construction and energy efficiency in line with policy CS15 of the Core Strategy.

Noise and air quality mitigation may be required on the site due to the proximity of the site to the M4. A noise and air quality survey would be required to accompany any planning application.

Noise mitigation measures have been installed along the A4 as part of the widening works, which should reduce the noise impact from the road.

The Environment Agency has not raised any concerns regarding an impact on water quality in the river.

11. Settlement boundary

Consultation comments:

- Breaching settlement boundary leading to urban sprawl

Council response:

The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

12. Comments from the site promoter

- The area of the whole site is 1.017ha. The preferred options DPD states that the site could accommodate approx. 24 dwellings at medium density – this equates to 23dph.
- It is considered that the site could achieve significantly more than this, in the region of 40 – 50 dwellings at a density of 50dph
- Object to the statement in the PO that the site should be considered in conjunction with EUA025. Due to its location and connections the site could come forward on its own and does not need to rely on development of the adjacent site

- The site could make an (almost) immediate contribution to the Council's land supply

Council response:

The developable area of the sites in the DPD has been reduced to more accurately reflect allowances required to provide for other uses such as open space or community facilities. Sites of between 0.8ha and 2ha, 80% of the site area is considered as the developable area. Indicative densities have been used across the district; a density of 30dph has been used for this site. While there might be some scope for a slightly higher density, new development should reflect the character of the existing residential development. Dorking Way has a density of approximately 29dph, therefore, a density of 30dph is considered appropriately for this site.

It is noted that the site could come forward independently of EUA025 and is available almost immediately.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Eastern Urban Area Rejected Sites

EUA004: Land at Pincents Lane, Calcot

Responses received: 3

Consultation responses

- Note that the site is “Not Currently Available”
- The site is subject to sink holes

Council response

Comments noted. The site was assessed as “Not Currently Developable” in the Strategic Housing Land Availability Assessment (SHLAA) due to the impact on the AONB and therefore, is not being considered for allocation.

EUA027: Land north of Pincents Lane, Calcot

Responses received: 3

Consultation responses

- The Hotel is Pincents Hotel, not Calcot Hotel
- Any erosion of the AONB is inappropriate
- Local Authorities have a legal duty to conserve and enhance the natural beauty of the AONB
- Agree with NWD report that as the RSS has been revoked there is no longer a requirement to locate 1000 houses in the AONB
- The AONB should only be for local needs
- Breaching settlement boundary which has been fixed for decades
- Development in the AONB should not support growth of Reading
- No other AONB in the South East is to be affected by this much development

Council response

Comments noted. The site was assessed as “Not Currently Developable” in the Strategic Housing Lane Availability Assessment (SHLAA) due to the impact on the AONB, and therefore, is not being considered for allocation.

Details regarding the name of the hotel are noted, the SHLAA will be updated when it is next published.

EUA032: Land to the east of Sulham Hill between Barefoots Copse and Cornwell Copse

Responses received: 5

General:

Consultation Responses

- Development likely to result in isolated enclave separate from the rest of the community
- Greenfield site
- At it is the site prevents detrimental visual impact from the existing settlement boundary over the AONB
- Support rejection of the site
- Reasons for rejection on this site apply to EUA031, EUA003/008, EUA033

Council Response

The site has not been recommended for allocation and did not form one of the preferred options within the DPD. While the Council's landscape assessment does not rule out development on the site, it did state that access would not come from Sulham Hill. The site promoter has confirmed that there is no suitable alternative access to the site. As suitable access can be provided to the other sites in this area, the reasons for rejecting this site are not relevant to the other sites.

Highways and Transport

Consultation responses

- The site has poor access
- Sulham Hill would need to be widened/straightened to improve the safety of the road to deal with increased traffic
- No public footpath along surrounding roads
- Lack of public transport provision would result in reliance on the private car

Council response

Comments are noted, many of the reasons given above are the reasons the site has not been taken forward as a preferred option.

The Council's Highways Development Control team have reviewed Sulham Hill, and there would not be a need to widen the road to accommodate development.

Landscape/Setting

Consultation responses

- The site is higher than existing housing to the east

Council response

It is noted that the topography of the site is higher than the existing housing to the east of the site.

It is not proposed to allocate the site for development.

Ecology

Consultation responses

- Highway improvements would result in the removal of trees protected by TPOs
- The site is surrounded by ancient woodland (Cornwell Copse/Barefoot Copse)
- Rejecting the site protects the trees covered by TPOs

Council response

The Landscape Assessment states that no access to the site should come from Sulham Hill due to the impact on the character of the area. It is for this reason that the site is not recommended for allocation.

It is noted that the site is adjacent to ancient woodland to the south, and a local wildlife site to the north.

Flooding

Consultation responses

- During heavy rain the site absorbs water to reduce run off downhill across the site
- Building on the site would increase run off and flood risk to neighbouring residential areas

Council Response

The site is a very low risk of flooding with no specific flood risk designations on the site. There is an area of surface water flood risk to the south of the site along the boundary with Cornwell Copse. Any surface water on the site could be mitigated through the provision of Sustainable Drainage systems (SUDs). The site promoter has submitted a flood risk assessment for the site.

Comments from the site promoter:

- The site has been excluded on the basis of proximity to ancient woodland and because of access concerns
- There is no public access to the site, it is used for grazing associated with Hall Place Stables
- The site is not within a preferred area for mineral extraction, and it is unlikely that gravel extraction on the site would be supported
- Development potential – 1.6ha at a density of 38dph giving approx. 60 dwellings

SA/SEA

- The SA/SEA does not indicate any significant constraints to development of the site
- Appropriate buffers to the ancient woodland would be provided
- There are no badger setts on the site, although there is evidence of badger activity
- Development of the site would avoid encroachment into the LWS with a min 15m buffer around the ancient woodland
- Existing trees and vegetation would be retained where practical

Highways and Transport

- The TA demonstrates that satisfactory access can be achieved without the need to widen Sulham Hill
- Access would be located slightly north of the existing access gate
- Some highway vegetation would be removed, but the tree report states that they are not of a high quality
- A simple T junction would be sufficient
- Pedestrian links would make use of the existing bridleway to the north and a new pedestrian access provided
- A footway along Sulham Hill is not considered necessary given that services/facilities are likely to be located to the east and the footpath/bridleway is more likely to be used than Sulham Hill

Landscape

- Limited impact on the landscape characteristics of the area
- The character of Sulham Hill can be retained without limiting the development potential of the site
- Access from Vicarage Wood Way would be likely to impact on the LWS

Flooding

- Wet ground conditions result from natural overland flows, a surface water drainage strategy would be developed

Council Response:

The Council's Landscape Assessment, while not specifically ruling out the site, indicates significant concern regarding the potential number of access points on to Sulham Hill, and specifically related to this site concerns over the removal of vegetation required to provide adequate access having a significant impact on the character of Sulham Hill.

It is recognised that there is no public access to the site, and that the site is used by Hall Place riding stables as grazing.

The site is not within a preferred area for mineral extraction; however, site is within a mineral consultation area. The site is underlain with gravel, which gives the potential for use or extraction prior to development of the site. This would need to be considered prior to development of the site in line with policies 1 & 2 of the

Replacement Minerals Local Plan. It may be that it is not appropriate to extract the gravel, but consideration still needs to be given to the potential.

The density of new development should be in keeping with surrounding existing development. The density of surrounding developments ranges from approximately 14dph at Barbara's Meadow and Conifer Drive, to 27dph at Highworth Way/The Knoll, and 34dph at Clements Mead, meaning that a density of approximately 30dph on this site would be appropriate if the site was being considered for allocation.

The SA/SEA is a decision aiding tool, it does not make decisions. Many of the sites assessed do not show any significant sustainability effects meaning that other issues must be considered when deciding whether or not to allocate a site. The outcome of the landscape assessment in relation to access from Sulham Hill is an issue that other sites do not have.

It is acknowledged that buffers to LWS and ancient woodland could be provided.

The Council's Highways Development Control Team no longer requires widening works to Sulham Hill, although improvements to Long Lane and the junction with Long Lane and Sulham Hill may be required depending on the number and location of sites which come forward in this area.

It is acknowledged that provision of a pedestrian link using the existing bridleway could be provided, however, the Council's Highways Development Control Team would like to see footways provided along Sulham Hill/Long Lane.

There is a low risk of flooding on the site; however, any surface water generated on the site would need to be dealt with via SUDs.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Theale General Comments

Responses received: 47

1. Contamination

Consultation comments:

- Potential for contamination on some sites

Council response:

The Council's Environmental Health team has been consulted on the sites. Where they have raised concerns regarding potential contamination on a site due to be allocated a contamination report will be required to accompany any planning application. This will show whether there is contamination on the site, and set out any required mitigation measures. Where there is potential for contamination of a site recommended for allocation the site promoter would need to produce a contamination report to accompany any planning application on the site.

2. Flooding

Consultation comments:

- Theale is at risk of flooding from a range of sources

Council response:

A Flood Risk Assessment would be required to accompany any planning application, should the site be allocated for development. This would need to take into account all potential sources of flooding and set out any mitigation measures, including Sustainable Drainage Systems (SUDs) that take into account surface water on the site.

Where a site is within Flood Zone 2 or 3 the Environment Agency have said that a sequential test would be required before any site within one of these areas could be allocated. The council do not intend to allocate any sites within these flood zones.

3. Highways and Transport

Highway Network/traffic

Consultation comments:

- Traffic/congestion (one way system through village, 20mph speed limits)
- Access issues
- Impact of M4/A4

Council response:

Transport Assessment work has been carried out and indicates that the development of the sites will not have a significant impact on traffic levels. Detailed site specific Transport Assessments will be required to accompany any planning applications submitted. These would assess the impact of the development on the local road network. It is at planning application stage that traffic management schemes would be considered. Theale town centre is already subject to a 20mph zone.

Road safety:

- Concern over road safety as a result of additional development

Council response:

Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider the local impact of the development, including safety, and consider any necessary mitigation measures. A travel plan promoting the use of alternative modes of travel to the car would also be required.

Parking:

Consultation comments:

- Concerns over lack of parking in the village

Council response:

New parking standards for residential development are proposed as part of the DPD and the new policy formed part of the Preferred Option consultation. These new standards are based on local car ownership; experience from recent new development requires a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking.

Public Transport:

Consultation comments:

- Rail services overcrowded
- Public Transport – simplyReading fare only valid in half the village

Council response:

Theale Station is currently being upgraded as part of plans to create a rail-based Park & Ride facility at the site. Construction of the station building is being undertaken by the rail industry. Theale Station is on the section of route scheduled to

be electrified, so will have electric rather than diesel train services from c.2017, which is likely to reduce journey times and increase passenger capacity. See <http://www.networkrail.co.uk/great-western-route-modernisation/>

The main 'Jet Black' branded bus service number 1 which uses the A4, Church Street, High Street and Hoad Way through Theale, is operated on a commercial basis by the bus company Reading Transport Limited (trading as Reading Buses) at their business risk, without any subsidy from West Berkshire Council. It operates every 30 minutes on Mondays through Saturdays and 60 minutes on Sundays and Bank Holidays. Discussions regarding improved bus services would take place between the Council, the developer and Reading Transport at the time of a planning application. The upgrading of the bus stops on the Jet Black 1 route through Theale has just been completed. This includes measures to promote the 'NextBuses' service, delivering live bus information via mobile telephones and online.

Comments regarding the simplyReading fares are noted.

4. Infrastructure

Consultation comments:

- Pressure on services/facilities (Doctors, schools, utilities – electricity, sewage, water supply, Broadband, village hall/community facilities)
- New housing needs to be accompanied by new infrastructure/Plan infrastructure then housing/long term investment in facilities/services
- Additional housing will boost the village, but need infrastructure improvements

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to whether the provision of additional services/facilities to serve the new population is necessary. New services/facilities as a result of new development would also benefit the existing community. Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and leisure facilities provided by West Berkshire Council) could be sought through CIL.

Education:

Consultation comments:

- Primary school in need of redevelopment – use of one site, build houses on school site

Council response:

A site is actively being sought for a new primary school site in Theale; a number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues.

Developer contributions

Consultation comments:

- Council Tax money paying for dealing with proposed developments

Council response:

Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and leisure facilities provided by West Berkshire Council) could be sought through CIL.

Infrastructure improvements benefits existing residents as well as new residents associated with new development.

5. Landscape

Consultation comments:

- Loss of Greenfield sites
- Change in character of area
- Loss of green space/open space/recreation space

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs. Sensitive design will be necessary to reflect and enhance the character and appearance of the area.

One of our Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and

natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in Core Strategy policy CS19.

All sites are required to provide a degree of open space in line with policy RL.1 of the West Berkshire District Local Plan 1991 – 2006 (Saved Policies 2007). Both preferred options sites are in private ownership, with no official public access. Development of the sites could improve open space and recreation facilities in the village.

6. Principle of Development

Site Identification Process

Consultation comments:

- Not followed due process in identifying sites
- No Environmental Impact Assessment carried out

Council response:

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA). Where additional technical reports have been produced these will be made available as part of the proposed submission consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

During the development of a planning document the Council is required to carry out a SA/SEA which in this case considers the environmental impacts of potential development sites. Environmental Impact Assessments are carried out for specific large scale projects/schemes, and are usually required to be submitted alongside a planning application where there is potential for a significant environmental impact.

Location and design:

Consultation comments:

- Need for period of consolidation
- Too many houses proposed
- Should built as far away from Theale as possible
- Existing committed development (inc. Lakeside)
- Process for allowing existing new development to bed in not followed
- THE003 preferable, THE001 possible, THE005 no
- Impact on historic Theale/conservation area
- Being a Rural Service Centre undermines Theale being a village
- Do not wish to become a town
- Sites are not a viable solution
- Shopping facilities not accessible for person with limited mobility

Council response:

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District including indicative housing numbers. Theale is designated as a Rural Service Centre in the Core Strategy. Rural Service Centres provide the role of a focal point for surrounding villages and rural areas in terms of service provision, and have capacity to accommodate some additional housing. The level of housing depends on individual settlements and varies depending on the character and function of the settlement.

The Core Strategy states that if the South Lakeside development goes ahead Theale would need to undergo a period of consolidation to allow facilities and services to be upgraded. The site promoters for the site have stated that it is unlikely that the consented scheme will come forward as it is; rather a lower density development across both north and south lakeside is likely to come forward.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design Supplementary Planning Document.

Existing committed development has been taken into account when calculating the remaining requirement for allocation through the DPD. In Theale a number of sites have been put forward as options for development, it is not the Council's intention to allocate all of these sites, the purpose of the preferred options consultation was to gain additional information to finalise which options to take forward.

Comments regarding accessibility to local shopping facilities are noted. Any new development or application for change of use would be required to meet current standards for disabled access.

Land use:

Consultation comments:

- Brownfield sites have not been considered

Council response:

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

Housing numbers:

Consultation comments:

- Too many houses proposed
- 60%+ increase in village size
- No need/demand for new housing

Council response:

The Housing Site Allocations DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The number of dwellings to be provided over the District in the longer term and the distribution of the number will be addressed in a Local Plan to be commenced when the Housing Site Allocations DPD has been adopted.

It is not the intention of the DPD to allocate all sites within Theale, options were presented at Preferred Options from which choices would be made as to which site/s would be taken forward through the Housing Site Allocations DPD.

7. Settlement boundary and loss of gap between settlements

Consultation comments:

- Outside settlement boundary
- Risk of becoming suburb of Reading/need to remain separate from Reading
- Loss of gap between settlements
- Development should be within the village boundary
- Urban sprawl
- Where would development stop? Boundary shouldn't be expanded further

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THE001: Former Sewage Works, Theale

Responses received: 81

1. General

Consultation comments:

- Devaluing properties
- Burghfield Park development
- Tendering/scoring mechanisms – will they be published?
- Review of proposals by independent consultants?
- Disruption to the local community during the development should also be considered.
- Increase in population would not in itself be a bad thing
- We need strategic planning that would go beyond West Berks.
- Impact on quality of life.
- Theale would require a period of rationalisation before any new sites are considered.
- Consultation periods have been carried out over school holidays when a larger number of affected residents/businesses may be away.
- The old site of Theale Motor Works (Station Road) is already under development along with the completed James Butcher Development beside and if the site of THE0005 goes ahead, as proposed, it will 'hem in' those properties between Angel Court and the cottage behind it.
- This site would be appropriately developed in conjunction with the adjacent land at Whitehart Meadow [Site THE002].
- Not notified directly about the consultation.
- Thatcham has had 2 sites rejected on the grounds that the homes are not required
- Reading's housing problems/shortage should not be of concern to WBC.

Council response:

Property values are not a planning issue, and so cannot be considered. The site at Burghfield Park is not in line with current planning policy and is not one of the Council's preferred options.

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Where additional expert advice/reports have been produced these will be made available as part of the next consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

Disruption during any construction period would be controlled by the use of planning conditions, which would be discussed and agreed with the site promoter at the planning application stage.

The Council has a Duty to Co-operate with neighbouring local authorities including Reading regarding the proposals outlined in the Housing Site Allocations DPD. However, the proposals in the Eastern Area are to meet the needs of West Berkshire.

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District. The principle of developing in the Eastern Area is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out that sites will be allocated to fulfil this requirement. Some of these will be on greenfield sites to meet the housing requirement for this area. All development will be of a high quality and sustainable design that respects and enhances the character and appearance of the wider area.

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish and Town Councils to discuss the potential sites to inform the site selection process. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal regulatory period of consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

All new residential development is required to deliver affordable housing in line with Core Strategy policy CS6.

THE002 is not a preferred option within the DPD and therefore, is not being considered for allocation at this stage.

2. Principle of Development

Housing Numbers

Consultation comments:

- With these sites there would be a 64% increase of the village
- No more homes, every little space that becomes available becomes accommodation.
- Significant amount of existing committed development yet to take place
- 20 or so houses per village would be better than all around one.

Council Response

The Housing Site Allocations DPD (HSA DPD) is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The number of dwellings to be provided over the District in the longer term and the distribution of the number will be addressed in a Local Plan to be commenced when the HSA DPD has been adopted.

Location and Design

Consultation comments:

- South Lakeside (350 homes) will lead to an increase of nearly 30% of the homes within the village. There should not be any additional development until South Lakeside is complete.
- Poorly related to settlement of Theale
- Impact on view from N and E
- Proximity to M4
- No development (inc. formal landscaping/gardens) within 8m of main river – suggested policy requirement (developable area is at least 8m from river)
- Change in historic character of area
- Impact on historic village, there must be more appropriate locations
- Development would be of low quality for the new residence due to the proximity of the motorway leading to low priced homes.
- Acknowledgement that Theale is a sustainable location and some new housing will help to sustain the High Street.
- So many flats being proposed!! Houses would be preferable, not bringing in so many occupants to drain and strain our amenities.
- Use site by A4 roundabout that has been cleared instead.

Council response:

The Council has recently held a meeting with the site promoter who owns both North and South Lakeside and is expecting a revised scheme which could deliver approximately the same number of dwellings as the existing consented scheme over the entire Lakeside site.

It is acknowledged that THE001 is separated from Theale itself by an area of public open space.

The Council have commissioned landscape assessment work to be carried out on the site. This concludes that if THE001 were to be considered further as a potential housing site, it would be necessary to have a reduced site area and a range of mitigation measures as set out in the report. The Landscape Assessment takes into account the Conservation Area and the historic development of Theale.

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised

settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

Where the Council is aware of suitable brownfield sites, these have been taken into account when calculating the remaining housing requirement for allocation.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design Supplementary Planning Document.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. The Preferred Options DPD provided a range of options for development in Theale, from which the most suitable would be chosen following the consultation. It is not the intention of the council to allocate all the sites put forward in Theale as preferred options.

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community.

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District. The principle of developing in Theale, which is defined as a rural service centre within the District's settlement hierarchy, is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out sites that will be allocated to fulfil this requirement. All development will be of a high quality and sustainable design that respects and enhances the character and appearance of the wider area.

Settlement Boundary

Consultation comments:

- Loss of Sulham Gap/green lung
- Development would reduce the gap between Theale and Calcot
- The site is outside the settlement boundary.
- The eastern boundary of Theale should be fixed as it currently is to maintain a natural buffer between Theale village and the M4 motorway.
- Development at the end of Blossom Lane would significantly redefine the footprint of Theale, making it substantially easier in the future to extend the housing estate by 'filling in the gap' between it and the rest of Theale.
- It's important that this narrow strip be left as a green belt (tree planted) to act as a buffer between the M4 and Reading's fringes.

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and

sensitive design will be important to respect and enhance the character and appearance of the area. See further comment above about the review of settlement boundaries and why this is necessary.

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire.

It is noted that this site is not particularly well related to the main settlement area of Theale.

Land use:

Consultation comments:

- Little effort made to identify brownfield land/ empty offices

Council response:

Where the Council is aware of available and suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

3. Infrastructure

Consultation comments:

- Pressure on services/facilities (doctor, schools, drainage, Fire Service, dentist, trains, play areas, police, sewage system)
- Theale residents travel miles to a swimming pool and do not qualify for Reading discounts.
- No consideration/assurance that infrastructure will be improved/increased to support new population.
- There is little provision for social activities for young children – the play areas in the recreation ground and just behind Meadow Way are woefully inadequate, not that well looked after or updated.
- The increase in population will exasperate pressure on our infrastructure further and see an increase in crime rates.
- Suspend with immediate effect all discussions surrounding the Theale developments at least until NHS England have published their plans for the current crisis at the Circuit Road doctor's surgery.
- We are already losing green space with a new Primary School being built, which will cause problems, regardless of where it is located.
- Does the Senior School have the capacity to cope with a large influx of children?
- Could be an ideal site for a school.

Council response:

Existing pressure on local services and facilities is recognised (Schools, doctors etc). The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with the service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL. All new development is required to provide open space, including play areas for children, in line with policy CS18 of the Core Strategy.

All developments will be designed to create safe environments, addressing crime prevention and community safety.

A site is actively being sought for a new primary school site in Theale; a number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues.

Consultation with the Local Education Authority has indicated that a satisfactory solution to school place provision can be achieved in this area.

Utilities

Consultation comments:

- The sewage system is already overloaded.
- The pylon and power lines may cause health problems.

Council response:

Thames Water has been consulted on the preferred options sites and has raised concerns regarding water supply capability and wastewater services in the area. A water supply and drainage strategy would need to be provided, should the site be allocated, to consider what additional infrastructure would be needed to support development of the site. Wording to include in a policy to guide the development of the allocated sites has been discussed and agreed with Thames Water.

National Grid has been consulted and has set out a number of recommendations. The presence of pylons and power lines does not preclude development taking

place, but is a factor that can affect amenity so is something to be weighed up through the site selection process, including the SA/SEA work.

4. Highways and transport

Highway network/traffic

Consultation comments:

- Access to the site is sub-standard. Blossom Lane between the existing houses and the site is very narrow. Furthermore, vehicles accessing the site would most likely use Crown Lane, which is also very narrow.
- Vehicle access should be via the High Street.
- New road to North required (cutting across golf course). Existing road not suitable.
- The current access through Blossom Lane and Chestnut Close narrows down to a single width road that many residents are forced to park down.
- You glibly talk about widening Blossom Lane; this is a conservation area and people actually live there....where will they park when you widen the road?
- Widening Blossom Lane would have impact on the limited parking currently allocated.
- Assessment of traffic through Theale High Street? Is this picked up by a site specific TA at the application stage?
- Traffic/congestion.
- Impact on Blossom Lane/ Blossom Avenue/ Crown Lane.
- There is only just space for a single car to drive down past house numbers 15-20 in Chestnut Close.
- Blossom Lane is a haven for pedestrians and local dog walkers to enjoy the peace and quiet this route provides.
- There is already very heavy traffic in Theale, especially on the High Street where it is often difficult to cross the road during peak hours and impossible to park.
- There does not appear to be any highway modelling/impact assessment or infrastructure plan.
- The proposed number of housing developments plus the IKEA development will greatly increase traffic problems.
- Parking along The Green and parking in the Village High Street for shopping are already at a maximum
- The existing road network which is effectively one lane rather than two lanes due to parking along Blossom Avenue, Blossom Lane and Crown Lane, and pinch points along the sharp bend from Blossom Lane into Crown Lane and residents parking bays along Crown Lane. Will they cope with additional traffic? Will all the roads need to be widened? Will residents parking be removed to accommodate a two-way flow of traffic? What will the quantity of traffic be from 88 new houses? How will this impact upon existing properties in terms of disturbance? What will any construction routes be?

Council response:

The council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network.

The TA work for this area takes into account the impact of IKEA. The TAs indicate that development of the sites themselves will not have a significant impact on traffic levels, meaning there will be limited impact on congestion.

The in-combination effect of the proposed developments has been taken into account. A site specific Transport Statement/Transport Assessment would be required to accompany a planning application. This would consider the local impact of the development (including traffic using the High Street), including access, and consider any necessary mitigation measures. A travel plan, promoting the use of alternatives modes of travel to the car, would also be required. This would be set out in any policy for the site.

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. The site Travel Plan will encourage new residents to consider alternatives to the car for everyday journeys which will help to reduce traffic through the High Street.

Road safety:

Consultation comments:

- No continuous footway from Village centre to site.
- Children often play out in the cul-de-sac.

Council response:

The limited pedestrian routes from the site are noted. Potential enhancements would be required in any policy for the site and dealt with at the planning application stage.

Public transport:

Consultation comments:

- Lack of railway capacity
- Things in this area take very long to materialise (the upgrade of the Train Station is a stellar case in point).
- Public transport infrastructure is inadequate

Council response:

Theale Station is on the section of route scheduled to be electrified, so will have electric rather than diesel train services from c.2017, which is likely to reduce journey times and increase passenger capacity. See <http://www.networkrail.co.uk/great-western-route-modernisation/> Theale Station is currently being upgraded as part of plans to create a Park & Rail facility. Delays in the project have been due to the reclassification of Network Rail as an organisation, however, Network Rail, First Great Western and the Council remain committed to delivering the improvements at the station.

The 'Jet Black 1' bus serves Theale and is operated on a commercial basis, with no subsidy from the Council. It operates every 30 minutes on Mondays through Saturdays and 60 minutes on Sundays and Bank Holidays. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

5. Pollution

Consultation comments:

- Pollution (air/noise)
- More carbon dioxide in the village. The site is probably contaminated by heavy metals and other contaminants from sewage.

Council response:

Noise and air quality mitigation would be considered if the site was allocated. This issue would be dealt with at the planning application stage by the Council's Environmental Health Department.

The Government are introducing higher standards of energy efficiency for new residential property via Building Regulations.

The Environment Agency has highlighted the site as having potential for contamination. It is likely that a full detailed site investigation for the site would be required, with potential for restrictions on drainage and deep foundations depending on the outcomes on the investigation. Further consultation would be required with the Environment Agency should the site be allocated.

6. Flooding

Consultation comments:

- Waterlogging/flooding

Council response:

The Environment Agency have confirmed part of this site is within flood zone 2. In line with Environment Agency guidance the developable area of the site would be outside the flood zone. A Flood Risk Assessment would be required should the site

be allocated, which would be required to set out mitigation measures including Sustainable Drainage systems (SUDs) to deal with surface water on the site.

7. Environment / Landscape

Consultation comments:

- This area is renowned for being on the natural peat bogs
- Theale uses its green areas, for football, cricket and community events
- Loss of countryside
- Impact on wildlife
- Permanent loss of natural habitat for flora and fauna.
- Landscape Assessment will need to be carried out.
- Cumulative impact with Eastern Urban Area sites.

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. The Council's landscape assessment has assessed part of the site as being suitable for development, although the developable area does not link with the existing settlement and includes significant buffers to all sides to limit the impact development would have on the AONB.

8. Comments from the site promoter

KPL supports the allocation and confirms that the site is suitable and available for development in the short-term.

In an earlier planning appeal (ref: APP/W0340/A/10/2133957) the Council stated in evidence that the site does contain a viable route through Blossom Lane without the requirement to secure access from any other development site. The Council now state that there are access concerns affecting the development. This is incorrect and needs amending.

Taking the power lines into account still leaves a developable area of circa 2.84 hectares of land. A density of 35 dwellings per hectare would allow for around 100 dwellings. Therefore the current capacity is under calculated.

Whilst the site is separated from the existing settlement boundary by an area of public open space, it is well related to existing services and facilities within Theale.

The Blossom Lane cul-de-sac would require modification as part of a traffic calming scheme to support the development.

Mix of dwellings sizes/types

Council response:

Support for the allocation of the site is noted. The Council's highway team have advised that they have access concerns due to the width of the lane and that additional land may be required to upgrade Blossom Lane to cope with the amount of traffic likely to be created by development of the site.

In order to widen the lane, land from a number of dwellings would be required. This raises deliverability concerns. Further details have been requested from the site promoter and, as yet, have not been provided. No other sites to the east of Theale are considered acceptable for development, at this stage, and therefore, access cannot be achieved through an alternative site.

Since the preferred options the Council has had landscape work carried out for the site to determine the acceptable developable area, given the site's proximity to the AONB. The Landscape Assessment indicates that approximately 1.8ha of the site is developable; with a density of 30dph this gives 54 dwellings, at 35dph this increases to 63. The Landscape Assessment also sets out a number of mitigation measures, including buffers to the AONB that would be required.

The site is separated from the existing settlement by an area of public open space; the landscape assessment requires buffers along the southern boundary of the site, which would further isolate the site from the existing development.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THE003: North Lakeside, Theale

Responses received: 66

1. General

Consultation comments:

- New houses will act as a shield if the fuel depot explodes
- Where will tendering and scoring mechanisms be published and will relative scores be available before contract award?
- Proposals seem to give more thought to increasing revenue from Council Tax than providing existing Council Tax Payers with services they are entitled to
- Will professional independent consultants review the plans, if so when will their finding be published

Council response:

All statutory safety precautions will have been taken by the fuel depot in order for it to operate.

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Where additional expert advice/reports have been produced these will be made available as part of the next consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

All comments made as part of the plan making process are taken into account by the Inspector. The Council only submits a plan to the Secretary of State for examination that it considers is sound and meets the tests above, and with Duty to Cooperate,

legal and procedural requirements met. Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL.

2. Principle of Development

Consultation comments:

- Previous application on this site refused pm access and proximity to neighbouring properties
- Theale is not a dormitory town of Reading
- Should be putting 10 houses here and there, as this has less impact on the local community
- Homes in The Green could be surrounded by new housing developments if this and THE009 are developed
- This site would be preferable over other sites in Theale
- Loss of village character
- If development of all these sites go ahead it would lead to an increase in the village of 64%
- The Core Strategy states that should Lakeside go ahead a period of consolidation is required for Theale for services and facilities to be upgraded – it is likely that the site will come forward, therefore, the period of consolidation is required
- Theale has already had its full quota of housing over the last few years
- The Core Strategy sets out a requirement for 1400 homes, it feels as if Theale has already had its allocation without considering any of the proposed sites
- The lake would be dangerous for young children
- Impact on historic character of the village
- Theale will become a small Town with this level of development
- Precedent for future development beyond current proposals
- The solution to the housing problem should be Garden Cities
- Need to consider strategic planning beyond the borders of West Berkshire
- It is acknowledged that Theale is a sustainable location with a train station, bus service and local shops
- Too many flats are being built, houses would be preferable
- Housing problems in Reading should not be of concern to West Berkshire
- Many properties within the area are unable to sell, therefore, not sure where the 'need' for new development comes from

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Area. The Eastern spatial area has its own housing requirement to be delivered. The Core Strategy was found sound by an Independent Inspector who agreed that based on the evidence provided the Eastern Area would be able to take the amount of development proposed. The Core Strategy

was adopted following the publication of the National Planning Policy Framework (NPPF).

The Housing Site Allocations (HSA) DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The number of dwellings to be provided over the District in the longer term and the distribution of the number will be addressed via a Local Plan to be commenced once the HSA DPD has been adopted. All development will be of a high quality and sustainable design that respects and enhances the character and appearance of the wider area.

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community.

This part of West Berkshire has a close functional relationship with Reading. Under its Duty to Co-operate obligations, the Council has a legal duty with other local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The housing requirement in the HSA DPD is, however, to meet the needs of West Berkshire rather than Reading.

It is likely that North and South Lakeside will be developed as a single site, with a lower number of dwellings than the existing extant permission for South Lakeside. The Council are expecting a planning application for the combined site to be submitted in the near future. This means that it is unlikely that Theale will received substantially more development than it would have received had south Lakeside been developed at the original scale.

Safety of the lake will need to be considered as part of the site design process. Any parents considering purchasing a dwelling on the site will be aware of the presence of the lake.

Development would need to take into account the historic character of Theale. This would be considered at planning application stage.

Garden Cities were a national policy. National policy requires local authorities to produce a Strategic Housing Market Assessment (SHMA) to determine their own Objectively Assessed Housing Need (OAN). Local Authorities then need to work together with their neighbours to determine the distribution of housing. West Berkshire Council is working with the other Berkshire Authorities to produce a SHMA which will be published in October 2015. Local Authorities in each housing market area will then work together to determine the distribution of housing across the housing market area going forward.

Land use and Alternative sites

Consultation comments:

- Should be considering brownfield sites not village periphery for development

- The LA has not exhausted all possible brownfield sites in the local area
- Use THE009 for the school, build on the school site and then stop building in Theale
- Use of empty offices at Green Park, Theale Business Park, Arlington Business Park for residential development

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. The Preferred Options DPD provided a range of options for development in Theale, from which the most suitable would be chosen following the consultation. It is not the intention of the council to allocate all the sites put forward in Theale as preferred options.

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

Planning Applications/Permission

Consultation comments:

- Lakeside area already have planning permission for 350 homes, more homes will be to the detriment of the local area
- New development should not take place until south Lakeside has been completed
- There are already a number of sites in Theale with planning permission (up to 438 dwellings). The impact of these development should be seen before additional housing allocated
- Burghfield Park development is going for planning for 250 homes, not strictly in Theale, but traffic will have to go through Theale to access motorways/trunk roads
- Concern Pincent's Hill will enjoy stronger political support against development than other areas
- Planning permission should not be extended to this part of the site.

Council response:

It is expected that a revised scheme for north and south Lakeside will be submitted, which will deliver approximately the same number of dwellings as the existing consented scheme over the entire Lakeside site.

Existing committed development has also been taken into account when calculating the remaining requirement for allocation through the DPD. In Theale a number of sites have been put forward as options for development, it is not the Council's intention to allocate all of these sites, the purpose of the preferred options consultation was to gain additional information to finalise which options to take forward.

The site at Burghfield Park is contrary to current planning policy and is not one of the Council's preferred options.

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District. The principle of developing in Theale is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out that sites that will be allocated to fulfil this requirement.

3. Consultation

Consultation comments:

- Carried out over school holidays while a large number of affected residents/businesses may have been away.

Council response:

The Preferred Options consultation is an early, informal stage, of consultation to gauge public views on the potential sites put forward for allocation. The consultation period was extended from the usual 6 weeks to take into account the school holidays. Prior to this consultation, workshops were held with local Parish Councils to discuss the potential sites to inform the site selection process. Parish Councils were also asked to advertise the Preferred Options consultation within their local community, prior to the start of the consultation.

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal regulatory period of consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

4. Coalescence of settlements

Consultation comments:

- Loss of separation between settlements

Council response:

A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore, be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in Core Strategy policy CS19 and therefore forms part of the site selection process.

5. Crime and security

Consultation comments:

- New development may increase crime rates

Council response:

All developments will be designed to create safe environments, addressing crime prevention and community safety.

6. Density

Consultation comments:

- High density housing is not in keeping with surrounding development
- The site may cope with 12 dwellings but not 50

Council response:

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design Supplementary Planning Document.

It is likely that the site will be developed in conjunction with south Lakeside, rather than as a standalone site.

7. Ecology

Consultation comments:

- Wild Geese use the area as a staging post
- Tree Preservation Orders on the site which bring into question the ecological impact of development
- Impact on wildlife (nightingales)
- Special site with great crested grebes, swans and moorhens nesting, anglers and local people are able to enjoy the wildlife
- Concern over increased recreational pressure on Sulham and Tidmarsh SSSI

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

All sites have been subject to consultation with the Council's ecologist. No significant concerns have been raised in relation to this site.

8. Flooding

Consultation comments:

- The lake often floods in winter
- Building too close to the flood plain
- Flooding and drainage are known problems so developing here is illogical

Council response:

The site is not within a flood zone. Small areas of the site are within a surface water flood risk area, and there is a lake within the site. A flood Risk Assessment would be required to accompany a planning application should the site be allocated for development. This would need to consider all sources of flooding and set out any relevant mitigation measures, including the provision of Sustainable Drainage Systems.

9. Highways and Transport

Consultation comments:

Traffic

- Traffic generated from the development would be appalling especially as the site is close to the schools which already cause traffic problems
- The High Street is already a bottle neck at peak times
- People use the Englefield Road / High Street as a cut through from Pangbourne to avoid the A4 roundabout
- The A4/Tidmarsh/Arlington Business Park is heavily congested at peak times
- Congestion on the A4 Theale bypass leads to rat running through the village
- Congestion at school pick up/drop off times
- Ever increasing levels of traffic along the A4 from Thatcham
- Congestion at Junction 12 in the evening causes backing up on to the M4
- Impact of IKEA on junction 12
- No highways modelling available for these sites
- Smart Motorway scheme on the M4 is a recognition that the volume of traffic on the M4 is too great

Council response:

The council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network. This assessment includes Theale. The TA work carried out for the Eastern Area sites takes into account the impact of IKEA. The TAs indicate that development of the sites themselves will not have a significant impact on traffic levels, meaning there will be limited impact on congestion. The TA considers all sites, in different combinations, and therefore, provides a worst case scenario for traffic impacts on the local network.

Detailed assessment work, including modelling of local junctions, would be carried out at planning application stage. A Travel Plan will also be required to accompany a

planning application. This sets out ways the development will promote and encourage the use of alternative modes of travel for everyday journeys.

Congestion outside schools at drop-off/pick-up times is an issue across West Berkshire. The Council work with schools to develop school travel plans, which work with pupils and parents to promote and encourage the use of alternative modes of travel, or park and stride schemes, to reduce congestion outside schools.

The Smart Motorway Scheme on the M4 aims to improve traffic flow and journey time reliability, in recognition of existing traffic pressures. The scheme helps to relieve congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limit to keep traffic moving smoothly. Improvements will deal with the current traffic levels, as well as making sure there is sufficient capacity for future growth.

Access

Consultation comments:

- No access should be provided from St Ives Close, access should come from The Green
- St Ives Close is a private road
- Access to St Ives close is currently dangerous
- Would be difficult to upgrade St Ives Close
- There are already a number of access points onto The Green in this area, another will be a road safety issue
- There is already a no right turn policy in place

Council response:

Comments regarding access are noted. The proposed access to the site is likely to come via the existing access on The Green. The site promoter has confirmed that they have access rights via St Ives Close, and therefore, any access details would be considered at the planning application stage and set out in a site specific Transport Assessment/Statement.

Parking

Consultation comments:

- On street parking on The Green is causing traffic problems
- School pick up/drop off parking causes problems with people blocking driveways and parking in marked "no parking" areas, on yellow lines and zebra crossing hazard markings
- Not enough parking and no scope to add more
- Proposals unlikely to provide adequate car parking as with previous new development
- Parking proposals are unrealistic, even one bed apartments may have 2 occupants with cars

- Lack of on street parking available within the village

Council response:

Issues relating to residential parking from new development are noted, and new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. The site Travel Plan will encourage new residents to consider alternatives to the car for everyday journeys which will help to reduce traffic through the High Street.

Comments relating to existing parking issues in the village are noted.

Public Transport

Consultation comments:

- Theale railway station does not have sufficient capacity to cope with existing demand
- Has a risk assessment been done regarding over crowding on the trains, and if so have the results been published?
- Appears to be no consideration of extra pressure on rail services from new development
- Upgrading at Theale Station is taking a very long time

Council response:

Theale Station is on the section of route scheduled to be electrified, so will have electric rather than diesel train services from c.2017, which is likely to reduce journey times and increase passenger capacity. Improvements are currently underway at Theale Station as part of plans to create a Park & Rail facility. These include a new ticket office and waiting facility and a lift bridge to allow disabled access to the station. Delays in the project have been due to the reclassification of Network Rail as an organisation, however, Network Rail, First Great Western and the Council remain committed to delivering the improvements at the station.

Theale is served by the 'Jet Black 1' bus service. It operates every 30 minutes Mondays to Saturdays and hourly on Sundays and Bank Holidays. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

Road safety

Consultation comments:

- More traffic will make it more dangerous for pedestrians in Church Street / High Street / Meadow Way

- Safety concerns regarding junction of Crown Lane, Station Road and High Street – Zebra crossing is very close to the junction

Council response:

New development is often accompanied by road safety improvements. A Transport Statement/Transport Assessment would be required to accompany a planning application. This would consider the local impact of the development and consider any necessary mitigation measures.

6. Infrastructure

Consultation comments:

- Overloading of services already going to happen because of the South Lakeside development
- Limited local services
- The preferred options DPD states that development would sustain existing services – services are already at capacity and cannot cope with substantial increases (schools, doctors, sewage)
- Lack of facilities in this area of West Berkshire compared to elsewhere in the district

Council response:

Existing pressure on local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

Medical services

Consultation comments:

- 2 week wait to get a doctor's appointment
- Current extension to surgery will not improve the situation
- Lack of support for mental health services in West Berkshire
- Pressure on social services
- Closure of local doctors surgery at Circuit Lane has added to pressure on Theale Medical Centre
- Proposals for new housing should be stopped until NHS England have published their plans for the crisis at Circuit Lane

Council response:

As referred to above, the requirement for additional medical services/facilities is addressed through the Infrastructure Delivery Plan in partnership with the service providers.

Emergency services

Consultation comments:

- Berkshire Fire and Rescue service cannot guarantee to meet target response times
- No permanent police presence in Theale, served by the Pangbourne branch

Council response:

The emergency services were consulted on the Core Strategy and so are aware of the Council's housing requirements. They have also been consulted as part of the Housing Site Allocations DPD. Improvements required are set out in the Infrastructure Delivery Plan.

Leisure/recreation

Consultation comments:

- Loss of green space if more sites lost for housing
- Children's play areas and new scooter park will become more dangerous with more children using the facilities
- Theale uses its green areas for football, cricket and community events
- Little provision of social activities for young children
- Poor quality play areas
- Little provision for older children – no youth club, swimming pool
- Library only open limited hours
- Three of the sites would result in the loss of fields/playing areas, which is not compatible with reducing areas for leisure activities, more thought should be given to providing alternative green areas if these sites are developed
- New skate park is well used

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. Development of the site will not impact on any formal recreation or leisure facilities.

All new development is required to provide public open space in accordance with policy RL.1 of the West Berkshire District Local Plan (1991 – 2006) Saved Policies 2007 and policy CS18 of the Core Strategy. There is potential for play equipment to be provided as part of this open space provision.

There are a number of leisure facilities in the local area, although it is acknowledged that some of these are within Reading rather than West Berkshire.

Education

Consultation comments:

- Schools are at capacity so much so a new site is been sought for the primary school
- Where will the children go to school?
- There is no room to expand the current school
- Any new school would not be in the centre of the village community
- Relocation of the school will cause problems regardless of where it is located
- Primary school so oversubscribed there are issues accommodating the children, providing school means and learning support required. The school are doing the best they can, but cannot offer the service required
- Theale Green is a poorly performing school
- A new school is needed to cater for the children from South Lakeside, it is difficult to see how the children from more new development would be catered for
- School needs more space and new teachers to be appointed before more homes are built

Council response:

A site is actively being sought for a new primary school site in Theale. A number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues.

Theale Green is now a 'rapidly improving' school.

Utilities

Consultation comments:

- Countless records of drains overflowing
- Sewage system is already running at capacity
- The sewers close to the Lamb fields are constantly needing to be pumped out

- Water systems in the local area cannot cope with current demand – Thames Water have said that water pressure cannot be altered as connecting pipe work is unable to cope
- Thames Water unable to cope with flooding at The Crown end of the High Street in Jan/Feb 2014. Any improvements are likely to come at the expense of the Tax Payer not Thames Water

Council response:

Thames Water has been consulted on the preferred options sites and has raised concerns regarding water supply capability and wastewater services in the area. A water supply and drainage strategy would need to be provided, should the site be allocated, to consider what additional infrastructure would be needed to support development of the site. Ongoing engagement has taken place with Thames Water through the Duty to Cooperate and they have advised on policy wording for the allocated sites.

10. Landscape

Consultation comments:

- The site falls within the setting of the AONB, a Landscape Assessment will be needed

Council response:

Since the Preferred Options consultation, a Landscape Capacity Assessment has been carried out on the site. The assessment states that development on only part of the site would be acceptable, given the extant planning permission of south lakeside. This has reduced the capacity of the site from approximately 50 dwellings to approximately 15 dwellings and set out necessary mitigation measures which would need to be picked up in the policy for the site.

11. Personal

Consultation comments:

- Impact on quality of life
- New development will ruin the reasons for moving to the village

Council response:

Disruption during any construction period would be controlled by the use of planning conditions, which would be discussed and agreed with the site promoter at the planning application stage.

12. Pollution

Consultation comments:

- Noise and air pollution will be introduced to a quiet and safe area of the village
- Potential for contamination as the site is a former gravel pit
- Villagers already suffer from noise pollution from the M4 and A4
- Lack of will to implement effective noise mitigation schemes

Council response:

Noise and air quality mitigation would be considered if the site was allocated. Noise and air quality surveys, including necessary mitigation measures, would be required in any policy for the allocation of this site, given the proximity to the A4.

13. Settlement Boundary

Consultation comments:

- Outside settlement boundary
- Will new settlement boundaries be subjected to further consultation?

Council response:

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. It is therefore necessary to carry out a comprehensive review of settlement boundaries to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

14. Comments from the site promoter

- A viable access can be provided to the site (see planning application)
- St Ives Close lies within the applicant's control – this overcomes a concern raised in the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)
- Suitable access has already been constructed onto The Green

Council response:

Comments are noted.

A site specific Transport Statement/Transport Assessment would be required to accompany a planning application. This would consider the local impact of the development, including access, and consider any necessary mitigation measures. A travel plan, promoting the use of alternatives modes of travel to the car, would also be required.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THE005: Land at Junction 12 (M4), Theale

Responses received: 72

1. General

Consultation comments:

- Tendering/scoring mechanisms – will they be published?
- Lack of consultation on affordable housing units
- Transparency and Developer tendering process
- Review of proposals by independent consultants?
- AWE outer consultation zone
- Impact on setting of Theale.
- Need to assess sites as a whole not in isolation
- Little provision for social activities (children of all ages)
- Need to provide green alternatives
- Unable to sell properties – where has the ‘need’ come from?
- Increase in population would not it itself be a bad thing
- Need a strategy plan to go beyond West Berkshire.
- Some neighbouring businesses are not compatible with housing
- What will the impact of other new sites be?
- Do developer contributions still exist and does the Council ensure that the money is always collected within the time period allowed before it is forfeited?
- Constraints on future business expansion, potential loss of businesses.
- Some neighbouring businesses are not compatible with housing
- Eastern WBC is the poor relation to Newbury with a lack of facilities compared to elsewhere
- Thatcham has had 2 sites rejected on the grounds that the homes are not required.

Council response:

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Where additional technical reports have been produced these will be made available as part of the proposed submission consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

Before the DPD can be adopted by the Council it will be subject to independent examination by the Secretary of State.

The Office for Nuclear Regulation (ONR) has been consulted on the Preferred Options DPD and did not raise any concerns. Should the sites be allocated for

development the ONR would be consulted during the planning application process in line with policy CS8 of the Core Strategy.

The Transport assessment has also assessed the in-combination effects of all of the proposed development.

The Council collects all developer contributions owed. New residential development is now subject to the Community Infrastructure Levy (CIL), which is payable at a standard rate per square metre of development for all residential development. This is payable on commencement of development, and is non-refundable.

H Foster & Son have not made the Council aware of any intention to expand their premises.

2. Principle of Development

Consultation comments:

- Not all options taken into consideration, must be more viable options in less populated areas which would cause fewer issues.
- Village already too big
- Significant amount of existing committed development yet to take place
- Already had allocated development
- Acknowledgement that Theale is a sustainable location and some new housing will help to sustain the High Street
- Reading's housing problems/shortage should not be of concern to WBC

Council response:

The Council's Core Strategy sets out the Council's housing requirement for 2006 – 2026. The Core Strategy also sets out the spatial distribution for development across West Berkshire, including within the Eastern Area. The Eastern spatial area has its own housing requirement to be delivered. The Core Strategy was found sound by an Independent Inspector who agreed that based on the evidence provided the Eastern Area would be able to take the amount of development proposed. The Core Strategy was adopted following the publication of the National Planning Policy Framework (NPPF).

Existing committed development has been taken into account when calculating the remaining requirement for allocation through the DPD. In Theale a number of sites have been put forward as options for development, it is not the Council's intention to allocate all of these sites, the purpose of the preferred options consultation was to gain additional information to finalise which options to take forward.

Under its Duty to Co-operate obligations, the Council has a legal duty with other local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. However, the housing requirement is to meet the needs of West Berkshire rather than Reading.

Housing numbers:

Consultation comments:

- Too many houses, 12 would be ok
- A smaller number of homes would be more sensible. With these sites there would be a 64% increase of the village
- Existing committed development – 30% increase in size of Theale

Council response:

The Housing Site Allocations (HSA) DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The number of dwellings to be provided over the District in the longer term and the distribution of the number will be addressed in a Local Plan to be commenced when the HSA DPD has been adopted.

Land use:

Consultation comments:

- Little effort made to identify brownfield land
- Use of empty offices

Council response:

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

Alternative locations

Consultation comments:

- The Theale Motor Works site appeared to be a 'retirement' site but now it includes affordable housing – why did the original consultation not include this and be added once people had commented?
- THE002 rejected – same reasons apply to this site
- Build on Car park at this end of the village and move the car park to this site. EUA003 is preferred if required.

Council response:

Theale Motor Works does not form part of the consultation on the DPD. However, revised plans for planning applications are subject to a second consultation period.

It is acknowledged that many of the issues affecting THE002 also impact on this site. The Environment Agency has stated that a sequential test would be required for any site in flood zone 2 or 3 to be allocated for development. As there are other suitable

sites in Theale, the Council cannot successfully carry out the sequential test, and therefore, this site is not being considered further for allocation.

The current landowners have not expressed a wish to develop this site for car parking.

Location and Design

Consultation comments:

- Loss of field
- Theale cannot cope with more development
- Change character of area
- Impact on historic village character
- Visual impact from M4/A4
- Impact on view from N and E
- Loss of views
- Overloading of development
- Only green public area on West Berks side of Calcot
- Loss of green space
- Period of consolidation required if Lakeside goes ahead
- Impact on amenities/privacy of properties adjacent
- Impact on the Conservation Area is acceptable given the small area involved.
- Houses would be preferable to flats
- Density higher than for recently refused site
- Density

Council response:

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District including indicative housing numbers. The principle of developing in the Eastern Area is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out the sites that will be allocated to fulfil this requirement. Some of these will be on greenfield sites to meet the housing requirement for this area.

Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design Supplementary Planning Document.

The Council has recently held a meeting with the site promoter who owns both North and South Lakeside and is expecting a revised scheme which could deliver approximately the same number of dwellings as the existing consented scheme over the entire Lakeside site.

Views from the site are mainly of the M4/A4. The loss of views from existing properties is not a planning issue, and therefore, is not considered when allocating sites.

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community.

Densities set out in the Preferred Options DPD are indicative and final densities for the sites, should the site be allocated, would be subject to discussion with the land owner and more detailed work at the planning application stage.

3. Consultation process

Consultation comments:

- Consultation period carried out over school holidays

Council response:

There will be a further opportunity for consultation on the proposed submission plan, which will set out the sites for allocation. This is a formal consultation and will last the statutory period of 6 weeks. Following the consultation the plan will be submitted to the Secretary of State for examination.

4. Ecology

Consultation comments:

- Impact on wildlife

Council response:

All sites have been subject to an initial screening for ecological sensitivity with the Council's ecologist. Any sites within significant ecological sensitivity were not put forward as preferred options.

5. Highways and Transport

Highway network/traffic

Consultation comments:

- Traffic/congestion
- Traffic from Burghfield Park development will impact on local roads
- Traffic congestion along the A4 to J12 is already a major issue for all of us who use the route.
- Traffic through Theale village is already at far too high a level.
- Lack of parking. Road used as storage for sand.
- Traffic – has highway modelling been done? Will it subject to public consultation?
- The resulting increase in traffic would cause an inconvenience to pedestrians and cyclists.
- Traffic due to M4 being a SMART motorway

- Use of road for parking for station – would lose this and park elsewhere in Theale.
- Junction 12 will be swamped with not only the developments at Theale but also those at Burghfield Lakes and Pincents Manor.

Council response:

Transport Assessment work has been carried out and indicates that the development of the sites will not have a significant impact on traffic levels. Where additional technical reports have been produced these will be made available (if not already) as part of the next consultation in the autumn.

Existing traffic and parking issues within the village are noted. New parking standards for residential development are proposed as part of the DPD and the new policy formed part of the Preferred Option consultation. These new standards are based on local car ownership; experience from recent new development requires a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. The improvements to the A4 (dualling), and the proposed Smart Motorway scheme for the M4 (Junctions 3 – 12) aim to improve traffic flow and journey time reliability. Smart Motorways help relieve congestion by converting the hard shoulder to a running lane and using technology to monitor traffic flow and vary the mandatory speed limited to keep traffic moving smoothly. Both improvements will deal with current traffic, as well as making sure there is capacity for future traffic growth. Consultation has taken place with Highways England, who has not raised any concerns regarding the sites in Theale.

The site at Burghfield Park is contrary to the Council's current planning policy and is not one of the Council's preferred options.

Using a public highway for the storage of sand would not be permitted without prior approval from the Council's Highways Department. If this site were to be allocated then this practice is likely to cease. During the Council's site visit, no sand storage was observed on the public highway.

The Transport Assessment looks at the combined impact of the preferred options sites, together with background growth and committed development.

Public Transport

Consultation comments:

- Lack of capacity (carriages) on railway line
- Public transport services – Theale Railway station – poor service from FGW (trains too small)
- Poor public transport
- Things take a very long time to materialise (e.g. station upgrade)

Council response:

Railway capacity issues are not within the remit of this consultation. However, Theale Station is currently being upgraded as part of plans to create a rail-based Park & Ride facility at the site. Construction of the station building is being undertaken by the rail industry. Theale Station is on the section of route scheduled to be electrified, so will have electric rather than diesel train services from c.2017, which is likely to reduce journey times and increase passenger capacity. See <http://www.networkrail.co.uk/great-western-route-modernisation/>

The main 'Jet Black' branded bus service number 1 which uses the A4, Church Street, High Street and Hoad Way through Theale, is operated on a commercial basis by the bus company Reading Transport Limited (trading as Reading Buses) at their business risk, without any subsidy from West Berkshire Council. It operates every 30 minutes on Mondays through Saturdays and 60 minutes on Sundays and Bank Holidays. Discussions regarding improved bus services would take place between the Council, the developer and Reading Transport at the time of a planning application. The upgrading of the bus stops on the Jet Black 1 route through Theale has just been completed. This includes measures to promote the 'NextBuses' service, delivering live bus information via mobile telephones and online.

Road Safety:

Consultation comments:

- The new scooter park will become even more dangerous with even more children using the facilities.
- Roads will be even busier for children to cross going to and from school.

Council response:

Any site allocated for development would be required to provide a Transport Statement/Transport Assessment for the site to accompany a planning application. This would consider the local impact of the development, including safety, and consider any necessary mitigation measures. A travel plan promoting the use of alternative modes of travel to the car would also be required.

6. Infrastructure

Consultation comments:

- Small village with limited service
- Need for developers to contribute more to improving facilities/services
- Increase population without improving infrastructure

Council response:

Existing pressure on local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required

through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. Any new facilities/services provided as a result of development would also benefit the existing community.

Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and leisure facilities provided by West Berkshire Council) could be sought through CIL.

In terms of services and amenities, this part of West Berkshire has a close functional relationship with Reading, and the District will continue to work in partnership with Reading to address cross boundary issues and requirements.

Education

Consultation comments:

- Build a new Junior school on this site

Council response:

A site is actively being sought for a new primary school site in Theale; a number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues.

Medical Facilities

Consultation comments:

- Propose – suspending all decisions on development until NHS England publish their plans for the crisis at Southcote Surgery

Council response

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New services/facilities as a result of new development would also benefit the existing community.

Utilities

Consultation comments:

- Pressure on sewage facilities

Council response:

Thames Water has been consulted on the preferred options sites and has raised concerns regarding wastewater services in the area. A water supply and drainage strategy would need to be provided, should the site be allocated, to consider what additional infrastructure would be needed to support development of the site. Further work has been undertaken with Thames Water which has informed policy wording to be used for any allocated sites.

Retail

Consultation comments:

- Theale has a post office – people come from Calcot to use it – may stop if too difficult to get to

Council response:

Any additional development in Theale will not prevent access to the post office.

Leisure/Recreation

Consultation comments:

- Little provision for social activities (children of all ages)
- No swimming pool/limited library opening times

Council response:

All new development is required to provide public open space in accordance with policy RL.1 of the West Berkshire District Local Plan (1991 – 2006) Saved Policies 2007. There is potential for play equipment to be provided as part of this open space provision. Therefore, there could be an improvement in public open space as a result of the development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as leisure facilities provided by West Berkshire Council) could be sought through CIL.

Emergency Services:

Consultation comments:

- Development of any of the sites would put people at risk as emergency services will not be able to retain appropriate response times. Impact on crime

Council response:

The emergency services have not raised this concern. All developments will be designed to create safe environments, addressing crime prevention and community safety.

7. Flooding

Consultation comments:

- Flooding/waterlogged site
- If my home suddenly becomes a flood area, would West Berkshire Council compensate me and my neighbours?
- Land at J12 (THE005) will include development in Flood Zone 2. Therefore a sequential test is required and it will need to be demonstrated that there are no reasonably available sites at lower flood risk.

Council response:

The site is within Flood Zone 2. The Environment Agency has said that a sequential test would be required before the site can be allocated. As there are alternative sites available with a lower risk of flooding, the Council cannot complete the sequential test for this site, and therefore, the site will not be allocated for development.

8. Landscape

Consultation comments:

- Loss of green areas
- Loss of countryside
- Inappropriate development in the greenbelt
- In setting of AONB – Landscape Assessment required

Council response:

The general concern is noted. However, as above, some development is necessary on greenfield sites. The site is not considered to be in the setting of the AONB.

There is currently no public access across the site. Should the site be allocated there would be a requirement for public open space to be provided in line with policy CS18 of the Core Strategy.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

There is no Green Belt within West Berkshire.

Natural England, following their consultation comments, has confirmed that they do not have concerns over development on this site.

9. Pollution

- Noise/pollution from A4/M4
- Overhead lines

Council response:

Noise and air quality mitigation would be required should the site be allocated. This issue would be dealt with at the planning application stage.

National Grid has been consulted and has set out a number of recommendations. The presence of pylons and power lines does not preclude development taking place. The proposed developable area is not directly affected by the presence of the pylons; however, it is considered that the pylons would, in reality, cause amenity issues.

10. Settlement Boundary

Consultation comments:

- The site is outside the settlement boundary.
- Reduction of gap between Theale and Calcot
- New settlement boundaries not drawn, will they be subject to further consultation?
- Loss of visual gap between Theale and M4
- Loss of definition between Theale and surrounding village
- Reduction of gap between Theale and Calcot

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Settlement Boundaries have not been reviewed since the development of the West Berkshire District Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is necessary to accommodate the required new development. The DPD provides the opportunity to review settlement boundaries of settlements within the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to

assess the settlement boundaries were consulted on as part of the preferred options consultation

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire.

11. Comments from the site promoter:

- Dispute developable area – could achieve 196 dwellings mixed use development, with hotel and some employment space (density of no less than 50dph)
- Part of the site may not be developable due to flooding and other mitigation (Pylons) current proposed allocation will not make optimum use of the site.

Council's response:

Densities set out in the Preferred Options DPD are indicative and final densities for the sites, should the site be allocated, would be subject to discussion with the land owner. Given the proximity of the site to the AONB and the existing densities of development in Theale, 50dph is not considered reasonable in this location.

As set out above, the Council cannot carry out the required sequential test as other sites, with a lower flood risk, are available in the area. Therefore, the site cannot be allocated for development

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

THE009: Land between A340 and The Green, Theale

Responses received: 70

1. General

Consultation comments:

- Site in productive agricultural use.
- Impact of development upon residents of The Green.
- Theale will increase by 64% if all of the sites go ahead.
- Development of THE009 could result in an additional 500 people, assuming families of four in each dwelling.
- Activity of developer tendering falls under the Public Procurement Regulations – will the tendering and scoring mechanisms be published?
- Concern that Pincents Hill will receive stronger political support than other areas – transparency must be maintained.
- Have professional independent consultants reviewed the plans?
- The Housing Site Allocations DPD is short term piecemeal planning with no strategic objective. Strategic planning that goes beyond West Berkshire is required.
- Proposals for south Lakeside and 200 homes off Station Road in Theale will place strain on Theale.
- Theale is meant to be a village not a town.
- Documentation refers to housing problems in Reading – this is of no concern to the Council, unless it is seen as an opportunity to raise funds to subsidise residents in Newbury and the western part of the district.
- The impact of the allocated sites on Theale cannot be fully assessed until outstanding planning commitments are completed. Allocations should therefore be made after the completion of the outstanding planning commitments. Such an approach will also enable changes to the spatial strategy to be made should national planning policy change, e.g. possible requirement for garden cities to meet housing needs.
- Theale will be used as a stop gap to the M4 corridor and London.

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area. The Preferred Options DPD provided a range of options for development in Theale, from which the most suitable would be chosen following the consultation. It is not the intention of the council to allocate all the sites put forward in Theale as preferred options.

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Where additional expert advice/reports have been produced these will be made available as part of the next consultation in the autumn. All information provided by or on behalf of landowners or developers is publicly available.

The final plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To be sound a plan needs to be:

- Positively prepared – the plan should meet the housing requirement of the district based on the policies set out in the adopted Core Strategy,
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
- Effective - deliverable over its period and based on effective working on cross-boundary strategic priorities.
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

The Inspector will consider all of the comments that have been submitted during the preparation of the plan. The plan that the Council submits to the Secretary of State for examination will be the plan that it considers is sound and meets the tests above, and also meets the Duty to Cooperate, legal and procedural requirements.

Existing committed development has also been taken into account when calculating the remaining requirement for allocation through the DPD. In Theale a number of sites have been put forward as options for development, it is not the Council's intention to allocate all of these sites, the purpose of the preferred options consultation was to gain additional information to finalise which options to take forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community. It is likely that North and South Lakeside will be developed as a single site, with a lower number of dwellings than the existing extant permission for south Lakeside. The Council are expecting a planning application to be submitted in the near future. This means that it is unlikely that Theale will receive substantially more development than it would have received had south Lakeside been developed at the original scale.

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District. The principle of developing in Theale is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out sites that will be allocated to fulfil this requirement.

This part of West Berkshire has a close functional relationship with Reading. Under its Duty to Co-operate obligations, the Council has a legal duty with other local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

2. Principle of development

Consultation comments:

- Theale is a sustainable location, e.g. train station, bus service and local shops, so suitable for some new housing.
- Landowner Englefield Estates promised that the land would not be built upon.
- Planning application rejected and an appeal dismissed for a doctor's surgery on the site.
- Is the site large enough to accommodate housing, a care house and parking?
- Potential for the site to accommodate an extra care home.
- Care home not required on the site – elderly already catered for in Theale.
- Would the care home be privately or NHS run?

Council response:

The adopted Core Strategy sets out the spatial strategy for the Eastern part of the District. The principle of developing in Theale is therefore established. Area Delivery Plan Policy 4 of the Core Strategy sets out sites that will be allocated to fulfil this requirement.

The site has been submitted for consideration as a potential housing site by the site promoter. The previous application for a doctor's surgery (86/27566/ADD) dates back to 1986/87. Planning policy has changed significantly since then and the site is now being considered for housing.

Should the site be allocated, the parameters for development would be set out within a policy in the DPD. Parking provision would need to be in accordance with the Councils revised parking policy. The proposed new policy on parking standards was consulted on as part of the preferred options.

Details regarding any potential extra care facility on the site would be subject to negotiation between the site promoter and providers.

Alternative sites for development:

Consultation comments:

- Use of brownfield sites, infill and conversion of non residential buildings will reduce the number of sites that need to be allocated.
- THE011 has planning permission and is smaller (lesser impact than THE009) and should therefore be developed first.
- Move Theale Primary School to THE009, and develop the primary school site for housing.
- Brownfield sites should be developed as a priority before greenfield sites, like THE009.
- Further review of suitable brownfield sites required. Little effort made by the Council in identifying brownfield sites for housing development.
- Conversion of non-residential buildings.
- Empty offices.
- Green Park.
- Theale Business Park.

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

Housing need:

Consultation comments:

- Need for housing understood.
- Housing requirement for Theale already fulfilled through recent development – no need for development of the four shortlisted sites.
- Experience of being unable to sell property – where has the 'need' arisen from? Who will buy/occupy the dwellings?

Council response:

The Housing Site Allocations DPD is a daughter document to the Core Strategy and does not reassess the housing number or distribution. The principle of both the housing number and the distribution of this has been established through the Core Strategy process.

Identification of sites:

Consultation comments:

- Not demonstrated that land of lower agricultural value in Theale, e.g. previously developed and non-agricultural land, available to accommodate development.

Council response:

Where the Council is aware of available, suitable brownfield land this has been taken into consideration in determining the remaining requirement for allocation.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

3. Affordable housing

Consultation comments:

- The proposal could include affordable housing.

Council response:

All new residential development on greenfield sites is required to deliver 40% affordable housing in line with Core Strategy policy CS6.

4. AWE Burghfield consultation zone

Consultation comments:

- Site within outer consultation zone, therefore HSE need to be consulted before the site can be allocated.

Council response:

The Office for Nuclear Regulation (ONR) has been consulted on the Preferred Options DPD and did not raise any concerns. Should the sites be allocated for development ONR would be consulted during the planning application process in line with policy CS8 of the Core Strategy?

5. Consultation process

Consultation comments:

- The old site of Theale Motor Works (Station Road) is already under development along with the completed James Butcher Development beside and if the site of THE0005 goes ahead, as proposed, it will 'hem in' those properties between Angel Court and the cottage behind it. This application, on consultation, appeared to be for a 'retirement' site but now it includes 'affordable' housing – why did the original consultation not include this and be added once people had commented?

Council response:

Revised plans for planning application are subject to a second consultation period.

6. Crime

Consultation comments:

- An increased population will result in higher crime levels.

Council response:

All developments will be designed to create safe environments, addressing crime prevention and community safety.

7. Density

Consultation comments:

- Too many houses in one place – smaller developments spread out have less of an impact.
- Too many houses proposed for the site.
- Previous development refused due to over development – proximity of North Lakeside was taken into account.
- No consistent guideline on densities – a higher density is being proposed than that of a recently refused development.

Council response:

Densities set out in the Preferred Options DPD are indicative based on the areas, and final densities for each of the sites, should the site be allocated, would be subject to discussion with the landowner and more detailed work at the planning application stage.

Consideration of the character and density of the surrounding area needs to be taken into account.

8. Ecology

Consultation comments:

- Impact on wildlife and wildlife corridors.
- Geese use the lake as a staging post.

Council response:

All sites have been subject to initial screening by the Council's ecologist. No issues have been raised regarding this site.

9. Flood risk

Consultation comments:

- Site within Flood Zone 2 – housing unsuitable.

- North east of the site subject to groundwater flooding.
- Site flooded badly in 2014.
- Site provides drainage after periods of heavy rainfall due to clay soil and marsh land.
- Lake floods during winters.
- Where will the water go if the lake is blocked?
- Existing issue of flooding in Theale, e.g. between the High Street and the relief road.

Council response:

The site is not within any flood zones. The site is within the groundwater emergence zone, and there are two small areas of surface water flood risk on the site. A Flood Risk Assessment would be required to accompany a planning application, should the site be allocated for development. This would need to take into account all potential sources of flooding and set out any mitigation measures, including Sustainable Drainage Systems (SUDs) that take into account surface water on the site.

10. Gaps between settlements

Consultation comments:

- Development would encroach upon the green space around Theale.
- Developments would result in the coalescence of currently defined areas.

Council response:

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire.

The general concern is noted however. A key feature of even the larger settlements in the District is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided. It will therefore, be essential that any new development helps sustain this strong sense of place and local identity.

11. Highways and transport

Access

Consultation comments:

- Access to the site will be compromised by the planned access to south Lakeside.

- Consideration needed of how any access to THE009 would relate to the existing access to the South Lakeside development.
- No space for access.
- Preferred access from The Green.

Council response:

There are several potential access points to the site. The specific access point would be determined through a Transport Assessment for the site which would accompany any planning application for the site. This would need to take into account any other access points in the vicinity.

The Transport Assessment which will accompany the DPD looks at the combined impact of the preferred options sites, together with background growth and committed development.

Highway network/traffic

Consultation comments:

- Centre of Theale narrow – additional vehicles from development will disrupt the flow of traffic, e.g. in High Street. One way traffic could solve this problem.
- Access to the site would affect traffic flows around Theale.
- Highway modelling/impact assessment not undertaken – will this be done and if so, subject to public consultation?

Congestion

Consultation comments:

- Existing congestion and traffic disruption would be exacerbated by development, particularly at peak times. Gridlock will be experienced.
- Existing road network could not cope with an increase in traffic, in particular the roads approaching the site, eg. Crown Lane, Blossom Lane and Blossom Avenue whereby it is difficult to give way to oncoming traffic.
- Existing congestion experienced at:
 - A4 to J.12 of the M4;
 - A4 Tidmarsh roundabout;
 - A4 Arlington Park roundabout;
 - High Street;
 - Church Street;
 - The Green; and
 - Hoad Way.
- Existing congestion in Theale influenced by:
 - commuters to Arlington Business Park;
 - traffic avoiding the roundabout on the A4 by-pass – impact felt on High Street;
 - school-related traffic – impact felt on The Green and surrounding roads;
 - inadequacy of public transport and subsequent reliance on car travel; and

- residential developments in Thatcham, Woolhampton, Aldermaston Wharf, and Sulhamstead Abbots.
- Development will increase congestion on:
 - High Street.
 - J12 of the M4, e.g. by shoppers to Sainsbury's – how will this be addressed?
- The Burghfield Park development for 250 homes will increase traffic through Theale as a result of residents accessing the M4.
- Development of IKEA will increase traffic levels in Theale.

Council response:

The council have commissioned Transport Assessment (TA) work to assess the impact that development of the preferred options sites would have on the highway network, the TA work for this area takes into account IKEA. The TAs indicate that development of the sites themselves will not have a significant impact on traffic levels, meaning there will be limited impact on congestion.

Development at Burghfield Park is contrary to policy and does not form one of the Council's preferred options.

Parking:

Consultation comments:

- Likely that there will be inadequate parking on the site.
- Guidelines for parking standards unrealistic – most households have two cars (including one bed flats) and provision should be made for this. Recent developments have not considered this, which has resulted in parking problems in the residential areas of Theale.
- Insufficient parking in Theale at present and no scope for increasing the number of spaces.
- Parking at capacity on High Street.
- Parking issues in The Green and surrounding roads created by Theale Green School pupils, parents and school buses.
- Rail commuters use The Green for parking.
- No parking areas and double yellow lines ignored by school related traffic.

Council response:

Parking issues throughout the village are noted.

Issues relating to residential parking from new development are noted; new parking standards have been consulted on as part of the Preferred Options consultation. These new standards are based on local car ownership, experience from recent new development, and therefore, require a higher number of parking spaces than the existing Council parking policy to be provided. There is recognition that people may want to own cars, even if they don't use them for everyday journeys, and therefore, need provision for parking. The site Travel Plan will encourage new residents to

consider alternatives to the car for everyday journeys which will help to reduce traffic through the High Street.

Public transport:

Consultation comments:

- Public transport inadequate.
- Peak time train services have an insufficient number of carriages. How many additional seats have been calculated as being required? What actions have been identified to ensure First Great Western makes additional seats available? Has a risk assessment been undertaken and if so have the results been published?
- Upgrades to Theale station have taken a long time to materialise.
- Unclear if improvements to bus services will be required.

Council response:

Theale Station is on the section of route scheduled to be electrified, so will have electric rather than diesel train services from c.2017, which is likely to reduce journey times and increase passenger capacity. Improvements are currently underway at Theale Station as part of plans to create a Park & Rail facility. These include a new ticket office and waiting facility and a lift bridge to allow disabled access to the station. Delays in the project have been due to the reclassification of Network Rail as an organisation, however, Network Rail, First Great Western and the Council remain committed to delivering the improvements at the station.

Theale is served by the 'Jet Black 1' bus service It operates every 30 minutes Mondays to Saturdays and hourly on Sundays and Bank Holidays. An increase in population often results in an improved bus service and this would be negotiated as part of any planning application.

Road safety

Consultation comments:

- An increase in traffic will compromise the safety of road users and pedestrians.
- Access to the site will reduce safety on The Green.
- Has a risk assessment been undertaken, and if so have the results been published?
- The junctions of the High Street with Crown Lane and Station Road are dangerous.
- Safety at the busy A4/A340/Wigmore Lane roundabout already an issue – how would the proposals impact on this roundabout?
- Reducing speed limits along The Green, Church Road and High Street to 20mph would reduce the risk of accidents.

Council response:

New development is often accompanied by road safety improvements. A Transport Statement/Transport Assessment would be required to accompany a planning application. This would consider the local impact of the development and consider any necessary mitigation measures.

5. Housing mix

Consultation comments:

- Too many flats proposed – houses preferable as this will result in fewer occupants and subsequently a reduced impact on facilities/services.
- The site could include a mix of dwelling sizes and types.

Council response:

West Berkshire Core Strategy policy CS4 expects residential development to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community.

6. Infrastructure

Consultation comments:

- There is only an infrastructure plan relating to the Core Strategy – when will one be produced that considers the proposed sites and will it be subject to public consultation?
- Unclear how the proposals will impact upon infrastructure and whether or not improvements will be required.
- The Council are not concerned with upgrading or providing new infrastructure to cope with the proposed development.
- Eastern part of the district is the poor relation when it comes to the provision of services/facilities.
- Existing infrastructure at capacity and development would create additional pressure.
- Long term continuous investment in infrastructure required.
- What provision is being made to reinforce social services?
- New housing may help to sustain the High Street.

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in consultation with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.

Any development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. It will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

Financial Contributions towards mitigating the impact of an increased population on infrastructure (such as GP and NHS dental services, leisure facilities provided by West Berkshire Council) could be sought through CIL.

All new development is required to provide open space, including play areas for children, in line with policy CS18 of the Core Strategy.

Education:

Consultation comments:

- Will there be sufficient pupil places to meet existing and future demand from new developments?
- Pressure on primary schools in West Berkshire and Reading Borough. Schools having to accept bulge year groups or expand. This will have a knock on impact on secondary schools.
- Theale Primary School fully subscribed – this impacts on class size, the quality of education and provision of school meals.
- Limited space at Theale Primary School precludes against expansion. Any new school would not be located in the centre of Theale.
- Theale Primary School does not have the funding to expand.
- Development will impact upon pupil places at Theale Green School.
- Theale Green School needs to expand.
- Theale Green School has not had any additional classrooms built despite increasing pupil numbers over the years.
- Theale Green School poorly performing – how will the Council improve standards to accommodate an increase in pupil numbers?

Council response:

A site is actively being sought for a new primary school site in Theale. A number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues. The education service has not raised any issues with regard to secondary school provision in Theale.

Emergency services:

Consultation comments:

- An increased population could result in Berkshire Fire and Rescue not meeting target response times.
- No permanent police presence in Theale – Theale is covered by Pangbourne police station which at capacity. An increased population will place additional strain on Pangbourne Police Station.

Council response:

The emergency services were consulted on the Core Strategy and so are aware of the Council's housing requirements and have not raised concerns. Improvements required are considered through the Infrastructure Delivery Plan.

Healthcare:

Consultation comments:

- Theale Medical Centre over capacity and development will further increase demand. How will this be addressed?
- Long waiting times to see GPs, eg. 11 days, 2 weeks, 3 weeks – this would increase with a larger population.
- Patients of Theale Medical Centre sometimes advised to use Reading NHS Walk-in Centre.
- Increased demand at Theale Medical Centre will put people's welfare at risk.
- Two new waiting rooms being added to Theale Medical Centre will not ease pressure.
- Closure of GP surgery in Southcote placing pressure on Theale Medical Centre. Allocations in Theale should not go ahead until NHS England has published their plans for the future of the GP surgery in Southcote.
- Limited options for Theale Medical Centre to expand, e.g. only the recreation ground.
- NHS are planning to place more services in local GP surgeries, thereby increasing pressure on surgeries.
- A new GP practice on THE009 would benefit the community.
- Dentists could not support additional demand.
- Mental health services non-existent – how will this be addressed?

Council response:

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan of the Core Strategy considered all the infrastructure (including schools, doctors) that would be required to support the development required through the Core Strategy (including the scale of development allocated to each of the spatial areas). The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of any appropriate additional services/facilities to serve the new population.

Leisure/recreation facilities:

Consultation comments:

- The site could be used to accommodate a leisure centre.
- Increased population will place pressure on existing recreation facilities, e.g. 'The Rec'.
- An increase in the number of children using the scooter park could be dangerous.
- Limited provision for social activities for young children – play areas in the recreation ground and behind Meadow Way inadequate and poorly maintained.
- Limited provision for older children – no youth club, swimming pool.
- Green areas used for sport (e.g. football, cricket) and community events.
- Three of the proposed sites take up fields and play areas – alternative green areas should be provided if these are built on.
- Limited library opening hours.

Council response:

The site is in private ownership and is being promoted on behalf of the landowner. Development of the site will not impact on any formal recreation or leisure facilities.

All new development is required to provide public open space in accordance with policy RL.1 of the West Berkshire District Local Plan (1991 – 2006) Saved Policies 2007. There is potential for play equipment to be provided as part of this open space provision. Therefore, there could be an improvement in public open space as a result of the development.

Any new development will be subject to the Community Infrastructure Levy (CIL) which was implemented on 1 April 2015. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as leisure facilities provided by West Berkshire Council) could be sought through CIL.

Utilities:

Consultation comments:

- Sewage network at capacity and this is demonstrated by:
 - foul smell from the sewers in Crown Lane;
 - need for sewers near the Lamb fields to be pumped out;
 - manual pumping of stations in Church Street and behind Meadow Way during winter months;
 - pumping station on Brunel Road unable to cope with demand resulting in flooding;
 - the recent expansion of the sewage network to increase capacity; and
 - Thames Water commenting at a meeting with residents that two new pumps were going to be installed.
- Development will place further pressure on the capacity of the sewage network which could result in flooding.

- Standard machinery unable to clear sewage blockages on the High Street and Angel Court.
- Development should not be considered until the current sewage system is upgraded.
- Water supply issues will be exacerbated by development.
- Impact of an increased population on the BT telephone exchange in Theale – currently at capacity and no plans by BT to upgrade the exchange to fibre.
- Two pipelines cross the site making it unsuitable for residential development – GPPS petroleum and AWE effluent line (which contains low level radioactive residue).
- High voltage pylons cross the site.

Council response:

Thames Water has been consulted on the preferred options sites and has raised concerns regarding water supply capability and wastewater services in the area. A water supply and drainage strategy would need to be provided, should the site be allocated, and the requirement for this would be set out in a policy to manage the development of the allocated sites.

Consultation has taken place with GPSS regarding the presence of the pipelines. The presence of pipelines does not preclude development. The developer would be required to undertake investigation work to determine the location of the pipeline and take it into account as part of the design process for a planning application should the site be allocated.

In July 2015 contracts were signed to install superfast broadband to 95% of Berkshire. The deployment is expected to be completed by the middle of 2017. Further information is available from the following website:
www.superfastberkshire.org.uk.

8. Landscape/setting

AONB:

Consultation comments:

- The western edge of Theale is the gateway to the AONB. A clean/green gateway is superior to buildings.
- Site in close proximity to the AONB with only the A340 separating the two.
- Site provides a visual buffer between the settlement and the AONB.
- Development would harm the setting of AONB by impacting upon on views into Theale from the AONB.

Council response:

Initial screening of the sites by the Council's ecologist has taken place. Sites with significant ecological issues have not been taken forward as preferred options.

The Council's landscape assessment has assessed part of the site as being suitable for development, subject to mitigation measures including that the developable area must include significant buffers to all sides to limit the impact development would have on the AONB.

Setting and character:

Consultation comments:

- If the site is allocated, a Landscape Assessment will be required with any recommendations adhered to.
- The western edge of Theale is the gateway to the village – a clean/green gateway will maintain the character of the village.
- Development will result in the loss of the historic village character.
- Development is resulting in Theale changing from a village to a series of characterless housing estates. Development would only contribute to this.
- High density housing would be unsuitable and out of character at this edge of village location.
- Site designated in previous Local Plan as an Area of Special Landscape Importance due to high landscape quality.
- Impact on the landscape along the A340.
- Development will impact upon the adjacent parkland of Englefield House. This is contrary to policy.
- Development would vandalise the beautiful countryside.

Council response:

Following the preferred options the Council have had landscape work carried out on the site. The Assessment indicates that only part of the site is suitable for development in landscape terms. This reduces the developable area by approximately half that which was included within the Preferred Options DPD. Various mitigation measures would also be required which would need to be adhered to in any planning proposal for the site.

9. Open space

Consultation comments:

- Open space would be provided on the site.
- Loss of space that the community enjoys.
- Green areas of Theale being lost to residential or industrial use.
- The new primary school being built will result in the loss of green space.

Council response:

The comments made are noted. Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

Should the site be allocated for development there would be a requirement to provide public open space in line with policy CS18 of the Core Strategy. This has the potential to increase legal public access.

10. Personal

Consultation comments:

- Development will impact on the quality of life and safety of local residents.
- Privacy will be compromised due to overlooking from the proposed development.

Council response:

Disruption during any construction period would be controlled by the use of planning conditions, which would be discussed and agreed with the site promoter at the planning application stage.

Privacy issues will be taken into consideration during the application and design stage, should this site be allocated.

11. Pollution

Consultation comments:

- Groundwater store underneath site could be polluted by development.
- Existing noise and air pollution from the M4, A4 and A340 – future occupiers of the site would be affected by this.
- Impact of pollution upon health.
- Appears to be no drive to implement effective noise mitigation schemes.
- Increased traffic levels will increase pollution.

Council response:

Noise and air quality mitigation may be required due to the proximity of the site to the A340/A4. Details of which would be dealt with at the planning application stage by the Council's Environmental Health Department.

12. Settlement boundaries

Consultation comments:

- Site outside settlement boundary.
- Site separated from the existing settlement boundary.

Council response:

Settlement Boundaries have not been reviewed since the development of the Council's Local Plan 1991 – 2006. A comprehensive review of settlement boundaries is, however, necessary to accommodate the required new development. The DPD provides the opportunity to review the settlement boundaries of settlements within

the Core Strategy's settlement hierarchy. The developable area of any site allocated within the DPD will be located within the revised settlement boundary. The revised settlement boundary redefines the 'settlement' area, and protects those areas outside the new boundary from development. Details of the criteria to be used to assess the settlement boundaries were consulted on as part of the preferred options consultation.

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

13. Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA): Appendix 9B Site Assessment Forms – Eastern Area:

Consultation comments:

- Sites should not be assessed in isolation from one another.
- It should be recognised that a Grade II Listed milestone may be within the site (unless it is within highway land).

Site selection – Sustainability Appraisal/Strategic Environmental Assessment:

- SA Objective 2, criteria: 'Will it increase opportunities for access to sports?' the site is adjacent to private playing fields which are the property of Theale Green School and public access is not allowed. Scoring should be changed to neutral.

Council response:

The purpose of Sustainability Appraisal (SA) is to ensure that sustainability issues are considered during the preparation of plans. The SA is an iterative process which identifies the likely effects of options and subsequently the effect of the Housing Site Allocations DPD, and the extent to which these options and the DPD help to achieve economic, environmental, and social objectives.

Development in this location would have access to sports facilities within Theale and the wider area. The assessment within the SA is not solely focussed on the school playing fields.

Treatment of Listed structure would be dealt with at the application and design stage.

14. Comments from the site promoter (West Waddy ADP on behalf of the Englefield Estate)

- Strong support for allocation of the site.
- SA/SEA supported, particularly the recognition that the site is close to local services and facilities in Theale and that there are no significant issues on the site which could not be overcome.
- The use of the site for a new build primary school is not ruled out, however it is considered that land in the ownership of the Englefield Estate on the northern edge of Theale could potentially be used for a new school.

- Development of the site would accord with the National Planning Policy Framework and would constitute sustainable development.
- Four tests of soundness met by the proposal.

Council response:

A site is actively being sought for a new primary school site in Theale. A number of locations are being discussed. The new school will be built to accommodate the existing pupil numbers and future pupil growth in the area and is necessary to address current capacity issues.

Other comments are noted.

Housing Site Allocations DPD Preferred Options Consultation – Key Issues and Council Responses

Theale Rejected Sites

Responses received: 4

THE002: Whitehart Meadow

1. General

Consultation comments:

- The site is not suitable for housing development

Council response:

The site was not one of the Council's preferred options and is not being considered for allocation.

2. Flooding

Consultation comments:

- Flood risk (fluvial/ground/surface)

Council response:

The Environment Agency have confirmed that 90% of the site is within Flood Zone 2 and is at high risk to groundwater flooding. Consequently a sequential test would be required before the site can be allocated. As there are alternative sites available with a lower risk of flooding, the Council cannot complete the sequential test for this site, and therefore, the site will not be allocated for development.

3. Location and Design

Consultation comments:

- Loss of village character

Council response:

It will be essential that any new development helps sustain this strong sense of place and local identity. One of the Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in policy CS19.

4. Pollution

Consultation comments:

- Power lines

Council response:

National Grid has been consulted and has set out a number of recommendations. The presence of pylons and power lines does not preclude development taking place. However, it is considered that the pylons would cause amenity issues.

5. Settlement Gap

Consultation comments:

- Reduction of settlement gap

Council response:

Development on greenfield sites on the edge of settlements outside existing settlement boundaries is necessary to address the District's housing needs and sensitive design will be important to respect and enhance the character and appearance of the area.

The 'gap' policy was a former spatial planning tool which identified an area which was considered essential to physically maintain an open area to retain the separate identity of two settlements. This policy approach was replaced a few years ago however in favour of a landscape character approach. Now, through a better understanding of the natural and built environment there is more flexibility in allocating changes of use and development. The policy designation 'strategic gap' or 'local gap' therefore, no longer applies in West Berkshire.

6. Comments from the site promoter:

General

- Object to exclusion of the site
- Close to services/facilities
- Extant permission for hotel
- Not in productive use
- Excluded solely due to flooding, despite mitigation being available – Flood Risk Assessment in preparation

Council response:

Comments noted. The Environment Agency have confirmed that 90% of the site is within Flood Zone 2 and is at high risk of groundwater flooding. Consequently a sequential test would be required before the site could be considered for allocation. As there are alternative sites available with a lower risk of flooding, the Council

cannot complete the sequential test for this site, and therefore, the site cannot be allocated for development.

Pollution

- No evidence on air quality/noise – can be mitigated

Council response:

Noise and air quality mitigation would be required should the site be allocated. This issue would be required through any policy for the site and dealt with at the planning application stage.

Location and Design:

- No evidence relating to issues of pylons/overhead lines
- Open up potential for development on THE001
- Masterplan for 125 dwellings

Council response:

National Grid has been consulted and has set out a number of recommendations. The presence of pylons and power lines does not preclude development taking place. However, it is considered that the pylons, in reality, could cause amenity issues.

It will be essential that any new development helps sustain this strong sense of place and local identity. One of our Core Strategy strategic objectives states 'to ensure that development is planned, designed and managed in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside' and this approach is taken forward in Core Strategy policy CS19.

It is noted that access to THE001 could be provided via THE002. Development of sites should not be dependent on others as this can impact on deliverability.

The masterplan is noted. Any scheme will need to be designed in an appropriate way in order to respect and enhance the character and appearance of the area, in accordance with policy CS14 of the Core Strategy and the Quality Design SPD.

Site Assessment

- Previously number 1 site prior to Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and Core Strategy submission draft 2010
- SA/SEA acknowledges no significant sustainability issues

Council response:

All work on assessing the sites has been carried out by the Council using a consistent technical evidence base. All background information is included or summarised in the SA/SEA. Where technical advice/reports have been produced these will be made available as part of the proposed submission consultation in the

autumn. All information provided by or on behalf of landowners or developers is publicly available.

Public Transport:

- Easily accessible by public transport

Council response:

The comment is noted, the site is close to local bus routes and Theale railway station, as are all sites in Theale.

Infrastructure:

- Large enough to provide community facilities/specialise accommodation

Council response:

The Infrastructure Delivery Plan (IDP) of the Core Strategy considered all of the infrastructure that would be required to support the development required through the Core Strategy. The Infrastructure Delivery Plan will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.

THE007: Burghfield Park

Consultation comments:

- Affordable housing is required
- Need area with least environmental impact
- Ill conceived site
- Theale very stretched
- Pressure on services/facilities
- Flood risk
- Traffic/congestion

Council response:

Comments noted. The site is contrary to the Council's current planning policy and did not form one of the Council's preferred options.

West Berkshire Council Local Plan Newsletter

Issue 1 – December 2013



Welcome to the first West Berkshire Local Plan Newsletter. We will be publishing newsletters regularly to keep you informed about the progress on the Local Plan and other policy documents.

What is the West Berkshire Local Plan?

The Local Plan is the Plan for the future development of West Berkshire which is drawn up by the Council in consultation with the community.

The Local Plan is made up of several parts called 'Development Plan Documents'. These include:

- **Core Strategy DPD** - adopted in July 2012. This sets out the overall vision, objectives and strategy for the future development of West Berkshire.
www.westberks.gov.uk/corestrategy
- **Minerals and Waste DPD** (currently being prepared). This will include a 15-year spatial strategy, with a vision and strategic objectives for West Berkshire, containing the policies for all minerals and waste developments.
www.westberks.gov.uk/mineralsandwaste
- **A Policies Map** will illustrate the policies of the Local Plan on an Ordnance Survey base.



- **Site Allocations and Delivery DPD** (currently being prepared). This will identify sites for housing and other types of development, and set out detailed planning policies to guide development in the district.
www.westberks.gov.uk/saddpd





West Berkshire Local Plan – next steps:

The timetable for the Local Plan, known as a Local Development Scheme (LDS), was updated in September 2013 and can be viewed at: www.westberks.gov.uk/lids

Site Allocations and Delivery Development Plan Document

There will be ongoing consultation with the community and stakeholders throughout the preparation of the Local Plan. In early 2014 there will be discussions with the District's Parish and Town Councils and a consultation on the issues and options to be considered through the Site Allocations and Delivery DPD. Please check our webpage for up to date information: www.westberks.gov.uk/saddpd

We are also in the process of producing a series of technical documents and assessments to inform the preparation of the Local Plan. These are known as the evidence base and include documents on housing, the economy, green infrastructure, leisure, infrastructure and flooding.

Strategic Housing Land Availability Assessment Update:

The Strategic Housing Land Availability Assessment (SHLAA) helps inform the preparation of the Local Plan by identifying potential land that could be used to provide new homes. It is an audit of land at a particular point in time and is updated regularly. We are currently updating the SHLAA following a "Call for Sites" earlier in the year. We expect to publish the revised document on our website in December 2013.

The SHLAA is a technical assessment, not a policy making document. The decisions about how many new homes need to be built and where they should be built will be taken in the Local Plan. Please check our webpage for up to date information: www.westberks.gov.uk/shlaa.

Minerals and Waste Development Plan Document

Those of you with an interest in Minerals and Waste planning will be aware that in 2012, West Berkshire Council agreed to progress with a single development plan document, which relates to minerals and waste development in West Berkshire. Officers have been working on collating and analysing the necessary evidence to support the development of the West Berkshire Minerals and Waste Development Plan Document.

The first stage of consultation (which will be on issues and options) will be taking place in December this year. If you would like to be informed about progress on this exciting new document then please register your interest by going to the West Berkshire consultation portal <http://consult.westberks.gov.uk/portal> We will also be advertising the consultation in the local media and at www.westberks.gov.uk/mineralsandwaste



New Supplementary Planning Documents (SPDs) (Adopted September 2013):

In September 2013 the Council adopted two new Supplementary Planning Documents (SPDs): one for Sandleford Park and one for the Pirbright Institute site, Compton.

Sandleford Park, SPD.

Situated on the southern edge of Newbury, Sandleford Park was allocated for development through the Core Strategy and provides an exciting opportunity to deliver a high quality urban extension to Newbury. Sandleford Park is expected to provide up to 2,000 homes along with associated infrastructure, including community uses, education provision and open space.

The SPD sets out a framework to guide the detailed development of the site through any future planning application and is available on the Council's website

www.westberks.gov.uk/sandleford

The Pirbright Institute site, Compton SPD.

The site, which was formerly known as the Institute for Animal Health site, is expected to close in the near future as the Institute consolidates its operations onto one site. The SPD has been produced to guide an appropriate and sensitive approach to any future redevelopment on this brownfield site, which is within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The SPD is available at

www.westberks.gov.uk/comptoniah

Neighbourhood Planning:

Local communities can now produce Neighbourhood Plans, to give them a greater say in how they want to see their area developed. In West Berkshire, Neighbourhood Plans will be produced by parish and town councils in consultation with local communities.

Stratfield Mortimer Parish Council has made the first application to West Berkshire Council to designate the Parish as an area for a Neighbourhood Plan. Further details on the application and on Neighbourhood Plans in general are available at:

www.westberks.gov.uk/neighbourhoodplanning

Community Infrastructure Levy (CIL):

The Community Infrastructure Levy (CIL) is a new levy system that local authorities can charge on new development in their area to help fund infrastructure required as a result of new development. A charging schedule sets out an authority's CIL rates, and when adopted, the use of developer contributions (also known as S106 obligations) becomes restricted. In any case, the Government propose to restrict the use of developer contributions from April 2015.

West Berkshire Council's charging schedule was recently subject to independent examination, and the Examiner's Report was received on 8 November 2013. The report recommends approval for the charging schedule, and the Examiner accepted two minor changes in the interests of clarity, which were suggested by the Council.

The timetable and details for the Council's adoption of the Charging Schedule will be made available in due course at:

www.westberks.gov.uk/cil



Would you like to be kept informed?

If you would like to be kept informed on the progress of the Local Plan and related documents, please register on our Consultation Portal at: <http://consult.westberks.gov.uk/portal> and register using the "login/register" section.

We are reviewing our database contacts and we need your help.

When registering, please select your areas of interest and if you are already registered, please consider checking these so that we only contact you about those topics that are important to you. The areas of interest are:

- Local Plan (includes Site Allocations and Delivery DPD)
- Developer's Contributions and Community Infrastructure Levy
- Minerals and Waste
- Transport Planning

Please also provide a valid e-mail address as this is our preferred method of contact.

If we have your address details wrong, or if you no longer wish to receive updates, please let us know using the contact details below or completing the slip at the end of this newsletter and returning it to us in the pre-paid envelope by Friday 10 January 2014.

Contact us:

Planning Policy email:
planningpolicy@westberks.gov.uk

Minerals and Waste Planning Policy email:
mineralsandwastepanningpolicy@westberks.gov.uk

Post: Planning Policy and Transportation Policy, Planning and Countryside, West Berkshire Council, Market Street, Newbury, RG14 5LD

Tel: 01635 519111

Name:

email:

Address:

.....

.....

.....

Tel. Number:

Please remove my details from the database

I wish to remain or be added to the database and receive updates on the following topics (*please tick all that apply*):

Local Plan (includes Site Allocations and Delivery DPD)

Developer's Contributions and Community Infrastructure Levy

Minerals and Waste

Transport Policy

West Berkshire Council Local Plan Newsletter

Issue 2 – April 2014



Welcome to our second Local Plan newsletter, which updates you on events and our work here since the last newsletter in December 2013.

West Berkshire Local Plan

Housing Site Allocations Development Plan Document (DPD)

A Housing Site Allocations DPD is now being prepared rather than a Site Allocations and Delivery DPD. This will allocate sites for housing to meet the remainder of the 10,500 housing requirement from the adopted Core Strategy and will mean that the Plan can be progressed more swiftly. The DPD will also include sites for Gypsies and Travellers and a limited number of housing policies, including those to guide development in the countryside.

Consultation on a 'preferred options' version of the DPD is scheduled to begin on 25 July 2014 for a 7 week period, and will include details of short listed sites for housing. The DPD is due to be adopted in December 2015, and will be followed by the preparation of a new Local Plan which will look longer



term and which will cover the full range of policies and allocate additional sites for development. If you have any comments on this approach, please send them to the Planning Policy team by Friday 30 May 2014 using the contact details at the end of this newsletter.

The Local Development Scheme (LDS) which is the timetable for the Local Plan will be updated to reflect these changes and will be available at:
www.westberks.gov.uk/lds

Minerals and Waste DPD Update

The consultation on the West Berkshire Minerals and Waste DPD Issues and Options Consultation has now closed and the authority is in the process of analysing the comments that we received along with the site nominations. The comments that have been received will be taken into account in the ongoing development of the West Berkshire Minerals and Waste DPD, which will be subject to further public consultation in the future.

We would like to take the opportunity to thank all of you who got involved in this consultation, and if you would like any further detail on the progression of this development plan document please visit the Council's website:

www.westberks.gov.uk/mwdpd

Local Plan evidence base:

To support and inform our work on the Local Plan we collect evidence, including undertaking and commissioning studies, assessments and appraisals. Collectively, this is known as the 'evidence base'.



WestBerkshire
C O U N C I L

Strategic Housing Market Assessment (SHMA) Update:

The housing requirement for West Berkshire set out in the Core Strategy was based on that in the South East Plan. Local authorities now need to establish their own housing requirement, based on assessing housing needs over the wider area. We are working with the other Berkshire authorities and the Local Economic Partnership to prepare a SHMA which will establish the housing market area (which reflects the linkages between places where people live and work), and assess the need for housing in this area, based on demographic and economic evidence. The new Local Plan will need to look at how this objectively assessed housing need can be met.

Gypsies, Travellers and Travelling Showpeople:

One element of the Housing Site Allocations DPD, set out above, will be the provision of sites for gypsies, travellers and travelling showpeople. In accordance with national guidance we will need to make an assessment of need for such sites across the district and set out a strategy through the plan to meet the level of identified need. This is likely to result in the allocation of sites for gypsies, travellers and travelling showpeople.

To assist with this work we have jointly commissioned a company called Opinion Research Services (ORS) to produce a Gypsy and Travellers Accommodation Assessment (GTAA). This study will involve a review of existing gypsy and traveller sites and an assessment of the need for additional authorised sites. The study also looks at the need for transit sites and site provision for travelling showpeople. It will form part of the evidence base that will help inform the preparation of the Housing Site Allocations DPD.



In addition, we are conducting a gypsies, travellers and travelling showpeople 'Call for Sites' exercise which will help us identify potential sites. This exercise will run between Monday 28 April 2014 and Tuesday 27 May 2014. If you have a site which you would like to be considered and assessed as part of the call for sites, please let us know by completing a form. The form is available online at www.westberks.gov.uk/gypsiesandtravellers or at Planning Reception in our Market Street Council Offices in Newbury.

Community Infrastructure Levy (CIL) Update:

We have been progressing the adoption of a Community Infrastructure Levy (CIL) for the district. The CIL is a levy that local authorities can charge on most new development in their area to help fund infrastructure required as a result of that development. West Berkshire's **Charging Schedule**, which sets out an authority's CIL rates, was adopted on 4 March 2014, and will be implemented on 1 April 2015. Any planning permission granted after 1 April 2015 will be liable to pay CIL. Further details can be found at: www.westberks.gov.uk/cil

The government intends that CIL will replace the current use of planning obligations to collect developer contributions. So, until 1 April 2015, the **'Delivering Investment from Sustainable Development' Supplementary Planning Document** will remain in force. But after that date, the use of S106 obligations (with the exception of the provision of affordable housing) will be scaled back. With that in mind, the Council will be revising the current SPD before April 2015, and a public consultation process is planned to take place in Summer 2014.

Keeping you informed

If you would like to be kept informed and are not already on our database, please register at <http://consult.westberks.gov.uk/portal>. If we have your contact details wrong, or if you no longer wish to receive updates, please let us know using the contact details below. Alternatively, you can also change your details and preferences on the consultation portal. If you need any assistance with using the system we will be happy to help.

WBC/P&TS/LB/0414

Planning Policy and Transportation Policy, Planning and Countryside,

West Berkshire Council, Market Street, Newbury, RG14 5LD
Tel: 01635 519111 Email: planningpolicy@westberks.gov.uk

If you require this information in an alternative format or translation, please call the Council on Telephone 01635 519111

West Berkshire Council Local Plan Newsletter

Issue 3 – Dec 2014



Welcome to our third Local Plan newsletter which updates you on our work.

West Berkshire Local Plan

Housing Site Allocations Development Plan Document

We had a huge response to our Housing Site Allocations Development Plan Document (DPD) preferred options consultation with comments from about 4,500 people.

We have nearly completed processing the comments so that they can be viewed on our website at <http://consult.westberks.gov.uk/portal>. We are now beginning to analyse the comments.

Part of the analysis involves liaising with technical experts and infrastructure service providers to discuss the matters arising to help us to respond to and address the issues raised. We are also undertaking additional technical work, for example transport assessments. We will also be updating our Infrastructure Delivery Plan (IDP) which sets out what infrastructure is needed to bring forward the housing sites.

Once we have analysed and responded to all of the comments, we will prepare an updated version of the DPD to include the selected housing sites. This is known as the submission version and will be consulted upon and then submitted to the Secretary of State alongside all of the consultation comments received so that it can be independently examined by a Planning Inspector at a Public Examination.

We had originally planned to start consultation on the submission version of the DPD in December 2014, however the high volume of responses received has meant that we have chosen to extend the timetable. We hope to produce a revised timetable in the coming weeks and we will publish this on the Housing Site Allocation DPD section of our website www.westberks.gov.uk/hsa when available.

Housing in the Countryside Policies: preferred options consultation

The Housing Site Allocations DPD will include policies to guide housing development in the countryside. We consulted on the preferred option version of the policies between September and October 2014, and around 150 comments were received. When these comments have been processed, they will be viewable at <http://consult.westberks.gov.uk/portal>. We will be analysing and responding to these comments alongside those comments received on the rest of the Housing Site Allocations DPD preferred options document.

Local Plan evidence base

To support and inform our work on the Local Plan we collect evidence, including undertaking and commissioning studies, assessments and appraisals. Collectively, this is known as the 'evidence base'.

Strategic Housing Market Assessment update

The Council, in cooperation with the other Berkshire authorities and the Thames Valley Local Enterprise Partnership, will shortly be commissioning a Strategic Housing Market Assessment (SHMA). The purpose of this study is to assess the longer term need for housing within the wider housing market area. This area will be defined by considering the relationships between where people live and work, which may not necessarily correspond to administrative boundaries. The study will assess the need for different housing types to meet the future needs of all sectors of our community. The outcome of the SHMA will be a revised housing number for the District to help us plan for the longer term.



WestBerkshire
C O U N C I L

Supplementary Planning Documents

Supplementary Planning Documents (SPDs) are a material consideration in the planning process and provide further information and additional detail to the policies within the Local Plan. We have just amended two of the Council's adopted SPDs:

Sandleford Park SPD

Sandleford Park was allocated through the Core Strategy as a strategic site for up to 2,000 dwellings to form a sustainable urban extension to Newbury. A SPD was prepared for the site and adopted in September 2013. This set out more detail on how the site should be delivered, taking into account the opportunities and constraints of the site. The SPD has now been amended to reflect the need for a single planning application for the site. The reason for this is to ensure that the site is comprehensively delivered with timely and well planned provision of infrastructure. This will maximise the potential of the site.

The amended SPD will be subject to a 7 week period of public consultation from 12 December 2014 to 30 January 2015.

The amended SPD and the consultation information can all be found at www.westberks.gov.uk/sandleford.

Delivering Investment from Sustainable Development SPD

This SPD was adopted in June 2013, and succeeds Supplementary Planning Guidance which was first adopted in 2004. It sets out our approach for securing contributions towards local infrastructure and services which are impacted upon by development. We needed to update this SPD as a result of the Council's adoption of the Community Infrastructure Levy (CIL). The updated SPD, which will be called 'Planning Obligations', was adopted by the Council on 11 December 2014 and will apply to planning applications determined on or after 1 April 2015, alongside the implementation of the CIL. Until then, the current SPD for Delivering Investment from Sustainable Development will remain in place.

Both SPDs can be viewed via: www.westberks.gov.uk/spd

Community Infrastructure Levy

In March 2014 the Council resolved to adopt a Community Infrastructure Levy (CIL) Charging Schedule. It also resolved to delay implementation until 1 April 2015. Work is ongoing to ensure that the implementation of CIL goes as smoothly as possible including the transition, from the current process of securing developer contributions through S106 agreements, to the payment of CIL, which will apply to applications determined on or after 1 April 2015. Developers and individuals wishing to submit applications from now on are advised to check the new webpage www.westberks.gov.uk/cil for advice and guidance on the operation of the levy. The Council has also updated its Local List of Documents which can be found at www.westberks.gov.uk/planningforms

Minerals and Waste Local Plan Update

We have been processing the comments that were made to the Issues and Options Consultation on the emerging Minerals and Waste Plan that was undertaken earlier this year. The commentary report, which will document all the comments made, along with the Council's response to the comments, is scheduled to be published in 2015. Due to the number of comments that were received this report will be accompanied by a summary report.

The evidence base for the Minerals and Waste plan is continually evolving and it is anticipated that an updated Local Aggregate Assessment will be published in the coming months along with the latest Minerals and Waste Authority Monitoring report.

Further detail on the progression of the emerging Minerals and Waste Plan can be found at: www.westberks.gov.uk/mwdpd.

Keeping you informed

If you would like to be kept informed and are not already on our database, please register at <http://consult.westberks.gov.uk/portal>

If we have your contact details wrong, or if you no longer wish to receive updates, please let us know using the contact details below. Alternatively, you can also change your details and preferences on the consultation portal. If you need any assistance with using the system we will be happy to help.

Name,
Address 1
Address 2
Address 3
Post Code

Your Consultee ID:

Additional Resident Consultee ID:

West Berkshire Council Housing Site Allocations DPD - Update

Dear Consultee,

Why am I receiving this letter?

You are receiving this letter because you, and a member of your household, are registered on our Planning Policy Consultation Database, either because you have expressed an interest in Planning Policy, or you have taken part in a consultation.

Housing Site Allocations DPD - Update

Thank you to all of you who responded to our recent Housing Site Allocations Development Plan Document Preferred Options Consultation (July – Sept 2014).

We received the highest number of consultation responses ever received for a planning policy consultation, with about 4500 people taking part. As a result the timetable for processing and responding to the comments received has had to be extended to enable the information to be fully taken into account as part of the decision making process. Originally the revised document was to go before a Council meeting of West Berkshire Council on 11 December. However, to ensure that we are able to give the comments full consideration, the publication of the revised document has been delayed. An updated timetable will be published, on our website, in due course (www.westberks.gov.uk/hsa).

When the plan is published, it will be subject to a formal six-week consultation, with additional comments invited. The revised document (known as the submission version of the plan) will then go before a planning inspector, for an 'examination in public.'

Keeping in touch

If you are the named contact on this letter then we have your name and contact details on our database, however, for the other member or your household who has made representations to us, we do not have a name. Please could you provide us with the name and contact details, including an email address (if you have one) for the other member of your household, quoting their consultee ID (see '*additional resident consultee ID above*') so that we can update our database.

Our preferred method of contact is email, so if you have an email address, please let us know so we can contact you by email in the future.

If you do not wish to receive further updates from us please let us know and we will remove your details from the database.

Yours Sincerely,

Planning Policy

From: on behalf of [PlanningPolicy](#)
To: [PlanningPolicy](#)
Subject: West Berkshire Council Housing Site Allocations DPD - Update
Date: 28 November 2014 15:24:41

Dear Consultee,

Why am I receiving this email?

You are receiving this email because you are registered on our Planning Policy Consultation Database, either because you have expressed an interest in Planning Policy, or you have taken part in a consultation.

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When the plan is published, it will be subject to a formal six-week consultation, with additional comments invited. The revised document (known as the submission version of the plan) will then go before a planning inspector, for an Examination.

You may have friends or neighbours who took part in the Housing Site Allocations DPD Preferred Options consultation who will not have received this email, as we do not have an email address for them. Where a consultee is registered on our database, without an email address, we will be sending them a single letter with a number of updates, in a couple of weeks time. You will receive another email with these updates at the same time.

If you do not wish to receive further updates from us please let us know and we will remove your details from the database.

Kind Regards,

Planning Policy Team

Planning Policy

Planning and Countryside West Berkshire Council Market Street Newbury RG14 5LD
(01635 519505) | Ext 2505 | planningpolicy@westberks.gov.uk
www.westberks.gov.uk/planningpolicy