

**BACKGROUND PAPER**

**APPROACH TO THE HOUSING SITE ALLOCATIONS DEVELOPMENT  
PLAN DOCUMENT**

## **Background Topic Paper**

### **1. Background**

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

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

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

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

The Core Strategy was examined at a time of transition in the planning system. This led to the Inspector examining the Core Strategy committing the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA), to comply with the National Planning Policy Framework (NPPF). The Core Strategy sets out the requirement to update the SHMA within 3 years of the adoption of the Core Strategy and to review the scale of housing provision should the SHMA indicate that housing provision within the District needs to be greater than currently planned. The Council was committed to this review by the Inspector for several reasons:

- The anticipated revocation of the Regional Strategy, which allocated the housing number for the District, and the timing of this.
- The emergence of the NPPF (March 2012) as the sole higher tier guidance for the preparation of Local Plans, and the key principle within this document to "boost significantly the supply of housing". The NPPF commits the local planning authority to "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..." (para 47) unless "...any adverse impacts of

doing so would significantly and demonstrably outweigh the benefits...." (para 14).

- The Inspector's conclusion that the Core Strategy did not fulfil the NPPF requirement of meeting objectively assessed needs in full.
- Other evidence sources presented at the Core Strategy Examination that indicate that the level of housing need and demand may be higher than the South East Plan figure of 10,500 net additional dwellings.

The SHMA was subsequently commissioned on behalf of the Berkshire Authorities and the Thames Valley Berkshire Local Enterprise Partnership (LEP). The Council has a statutory duty to cooperate with its neighbouring authorities and it was therefore essential that the assessment was undertaken in conjunction with them. Neighbouring authorities, including in Hampshire, Wiltshire and Oxfordshire have also been involved, in accordance with the duty to cooperate. The outcomes of the SHMA were made public at a Stakeholder Event in October 2015 and are summarised in Section 6

## **2. Approach to the preparation of the Housing Site Allocations DPD**

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

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

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

- The SHMA was carried out in partnership with other authorities within the Housing Market Area. Following the assessment of the objectively assessed needs, there is a necessity to discuss and agree the housing distribution across the Housing Market Area before new housing requirements can be proposed through the Development Plan process.
- A new housing requirement would be likely to result in the need to revise the spatial strategy which guides housing distribution in the

District. The spatial strategy was based upon the 10,500 housing number as set out in the South East Plan and this will need to be reviewed. Any higher housing number will have implications in terms of how this increased level of housing is distributed across the District, and how this is taken forward through policy documents. Due to the characteristics of West Berkshire, it will not be possible just to pro-rata any additional housing across the District. A higher number will necessitate reassessing the housing distribution and potentially reconsidering the need for additional strategic level development. This would delay the allocations process and affect the Council's ability to maintain a healthy 5 year supply of housing land.

- A new housing number which looks longer term will necessitate a review of the evidence base upon which the Core Strategy is based.

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

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

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

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

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

### **3. Regulation 18 consultation**

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

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

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

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

### **4. Justification for the Council's Approach**

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

Instead, the Council's approach is a positive one that aims to actively encourage housing delivery by allocating sites through the plan-led system at

the earliest opportunity. Preparing a Housing Site Allocations DPD within the framework of the adopted Core Strategy has the benefit of implementing an already adopted framework for this level of development. The approach aids certainty for the community and developers about both the location and quantum of future development in the short to medium term and allows infrastructure requirements to be considered holistically, through partnership working with providers.

A figure for the District's full objectively assessed need (OAN) is now available. The OAN figures from the SHMA (which is a full assessment of needs across the wider HMA area), have been released and the document is expected to be published in November 2015. Work is now underway to establish a revised and longer term housing requirement for the District following effective cooperation on the spatial distribution with other local planning authorities across the Housing Market Area and beyond.

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

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

**Phase 2:** A new Local Plan for the District. This will allocate sites to fulfil the rest of the housing requirement that follows on from assessing the objectively assessed needs of the District and look to the medium and longer term. 1000 units at Sandleford Park will contribute towards the longer term requirement as the second stage of the development is expected to come forward after 2026. The Local Plan will also review the spatial strategy and include a full policy review.

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

Additionally, the National Planning Policy Guidance (NPPG) issued by the Government on 6 March 2014 made it clear that local plans may be found sound conditional upon a review in whole or in part within 5 years of the date of adoption (reference 12-008020140306). In his letter to the Planning

Inspectorate of 21 July 2015 <sup>1</sup>Greg Clark, the Secretary of State for Communities and Local Government, emphasises the real value of getting a Local Plan in place at the soonest opportunity and the value of pragmatism and flexibility in order to achieve a sound Local Plan.

The Council has explained its approach to the DPD in recent Section 78 appeals. The Council explained that the DPD is not designed to reassess housing numbers but rather, as a “daughter document” to the Core Strategy, aims to bring forward the remainder of the Core Strategy requirement in an early and plan-led way thereby boosting the housing land supply at the earliest opportunity. The Inspector hearing the Man’s Hill appeal (Appeal Ref: APP/ W0340/ A/ 14/ 2226342) considered that the DPD “is an appropriate way to seek to boost the supply of housing land within the existing planning framework for the area”. The Inspector at the Firlands Farm appeal (Appeal Ref: APP/W0340/ A/ 14/ 2228089) considered that the approach and policies of the HSA DPD are broadly consistent with the policies in the NPPF.

Additional support for the approach can be found in the outcome of a High Court Challenge (Gladman Development Ltd and Wokingham Borough Council) where the Inspector concluded that the NPPF “ does not require a development plan document which is dealing with the allocation of sites for an amount of housing provision agreed to be necessary to address, also, the question of whether further housing provision will need to be made”.

The Council is able to clarify that any additional requirement for allocation of land for residential development to meet a revised housing requirement will not be an issue until later in the plan period and will have been addressed well within the required timescale by progressing the Local Plan as timetabled.

The Council has set out timetables for both of these plans within an adopted Local Development Scheme which is publicly available on the Council’s website at [www.westberks.gov.uk/lds](http://www.westberks.gov.uk/lds). The Council has committed resources to this timetable.

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

	Consulting on scope of Sustainability Appraisal	Public Participation in the preparation of the DPD	Publication of Proposed Submission Documents	Submission to Secretary of State	Start of Independent Examination	Adoption
<b>Housing Sites DPD plus selected</b>	September 2013 to October 2013	September 2013 to December 2015	September 2015	February 2016	April 2016	September 2016

<sup>1</sup> Letter from the Rt Hn Greg Clark MP to the chief Executive of the Planning Inspectorate, entitled Local Plans: 21 July 2015 at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/447372/SofS\\_letter\\_to\\_PINS\\_-\\_local\\_plans\\_TB.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447372/SofS_letter_to_PINS_-_local_plans_TB.pdf)

<b>housing policies</b>						
<b>West Berkshire Local Plan</b>	September 2016 to October 2016	September 2016 to September 2018	July 2018	December 2018	February 2019	September 2019

## 5. Duty to Cooperate

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

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

## 6. The Strategic Housing Market Assessment (SHMA)

The six Berkshire unitary authorities, together with the Thames Valley Berkshire Local Enterprise Partnership (LEP), commissioned consultants GL Hearn to prepare a SHMA for the relevant housing market areas. The purpose of the SHMA is to develop a robust understanding of housing market dynamics and to provide an assessment of the future needs for both market and affordable housing, together with the housing needs of different groups within the population.

The SHMA does not set housing targets. It provides an objective assessment of the need for housing but makes no judgements on future policy decisions. Housing targets will be set in local plans. They will be informed by the SHMA but will take into account a range of other evidence including development constraints, infrastructure and land supply. West Berkshire will work with the other authorities within the defined housing market area (HMA) to test what level of development can be sustainably accommodated in the area, with the objective of meeting the objectively assessed need (OAN) as far as is consistent with national policies, as set out in the National Planning Policy Framework (NPPF).

The first stage of the SHMA was the identification of the relevant housing market areas. A housing market area is defined in the PPG as a “geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. (ID 2a-010-20140306). The consultants reviewed existing information, including SHMAs prepared for adjacent areas and analysed relevant data including house prices, household migration patterns and commuting flows in order to define the HMAs. In accordance with established practice and guidance, the HMAs were based on a ‘best fit’ to local authority boundaries, though recognising cross boundary influences and interactions. There was strong evidence to support definition of two separate HMAs containing the Berkshire authorities – a Western Berkshire HMA covering Bracknell Forest, Reading, West Berkshire and Wokingham, and an Eastern Berkshire HMA comprising Slough, Windsor and Maidenhead (RBWM) and South Buckinghamshire district.

The second stage of the study was the assessment of the need for housing, based on an understanding of the characteristics of the HMAs. The household projections published by the Department for Communities and Local Government (DCLG) provide the starting point estimate of overall housing need. These were considered against alternative demographic scenarios with the official projections considered to be the most robust. The projections were re-based to take account of the 2013 Mid Year Population Estimates, as the PPG recommends. The household projections were then converted into housing needs by applying an allowance for vacant and second homes, based on the 2011 Census data, followed by an adjustment to meet the assumed increase in net migration from London in the modelling underpinning the Further Alterations to the London Plan (FALP). This assumes an increase in net migration from London post 2017. The demographic need was assessed for West Berkshire as 551 dwellings per annum over the period 2013 to 2036.

The PPG is clear that an assessment is also required of the likely changes in job numbers based on past trends and/or economic forecasts and having regard to the growth of the working age population in the HMA. Where the supply of working age population that is economically active is less than the projected job growth, this could result in unsustainable commuting patterns. The SHMA has examined both economic projections and past trends for the authorities within the HMAs and concluded that the economic -led need is higher than the demographic -led need in the Western HMA. An upward adjustment of 35 dwellings per annum has therefore been made to the West Berkshire figure.

A further adjustment has been made to improve affordability, based on reversing the suppression in household formation, experienced since 2001, for the population aged under 45. This results in an upward adjustment of 79 dwellings per annum for West Berkshire, resulting in an OAN of 665 dwellings per annum.

## 7. Housing Distribution to meet the Core Strategy Requirement

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

Monitoring work from March 2015 (the latest published data) shows the following land supply position.

<b>Spatial Areas</b>	<b>Requirement</b>	<b>Completions</b>	<b>Commitments and strategic allocation at Sandford Park</b>	<b>Remaining</b>
Newbury/Thatcham	Approx 6,300	2,453	3,182	665
Eastern Area	Approx 1,400	324	471	605
AONB	Up to 2,000	1,138	240	622
East Kennet Valley	Approx 800	472	89	239
<b>TOTAL</b>	<b>10,500</b>	<b>4,387</b>	<b>3,982</b>	<b>2,131</b>

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

It is not necessary to allocate land for the entire remaining requirement shown in the table above. The figure is reduced by including in the supply sites that have been identified through the prior approval process (with permitted development for change of use, primarily from offices to residential), a limited number of identified sites within settlement boundaries and a cautious windfall allowance. This is set out for the individual spatial areas in Appendix A.

## 8. Implications of the SHMA and the Objectively Assessed Need for Housing

As outlined in Section 6, the SHMA itself does not set a new housing target. That will be set through the new Local Plan following additional work on constraints and opportunities for development, carried out in cooperation with the other authorities within the HMA. There will also be a process of consultation and ultimately any new housing target will be tested through the examination of the new Local Plan. The Council's approach to the HSA DPD was always that the allocations will meet the first part of the OAN by bringing forward sites in a plan-led way at the earliest opportunity. There is therefore a need to show how far the proposals in the DPD go towards meeting the OAN or any likely revised housing requirement. It is also important to consider the housing requirement to be used in the calculation of the five year housing land supply, which needs to be demonstrated in order to ensure that policies are considered up-to-date.

There are a number of options for how the SHMA can be taken into account, both in the Housing Site Allocations DPD and in the demonstration of a five year housing land supply, in advance of setting a new housing requirement through the development plan process.

- Option 1. Continue to use the Core Strategy requirement until work carried out in cooperation with neighbouring authorities sets out a new draft requirement for the HMA and for the individual authorities.
- Option 2. Use the OAN from the SHMA as the interim housing requirement
- Option 3. Use an intermediate requirement which acknowledges the OAN but does not give full weight to the outcome, taking account of the fact that it has not been tested or moderated against relevant constraints.
- Option 4. Using demographic-led projections based on household projections published by the Department for Communities and Local Government (DCLG)

**Option 1.** The Housing Site Allocations DPD is a 'daughter' document to the Core Strategy and does not seek to establish a new housing requirement. The Government has made clear in a letter from Brandon Lewis, Minister of State for Housing and Planning<sup>2</sup>) that the outcome of a SHMA does not immediately or in itself invalidate housing numbers in existing Local Plans.

Despite this, it is apparent from appeal decisions that the Core Strategy requirement, which was based on the requirement in the now revoked South East Plan, is seen as out-of-date. Though Core Strategy Policy CS1 allowed a period of 3 years for an update of the SHMA followed by a review of the scale

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<sup>2</sup> Letter from Brandon Lewis, Minister of State for Housing and Planning to the Chief Executive of the Planning Inspectorate: 18 December 2014 at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/390029/141219\\_Simon\\_Ridley\\_-\\_FINAL\\_SIGNED.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/390029/141219_Simon_Ridley_-_FINAL_SIGNED.pdf)

of provision, the Council recognises that it can no longer rely on the Core Strategy figure to demonstrate the five year supply position.

**Option 2.** The PPG is clear that where evidence in Local Plans has become outdated, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact that they have not been tested or moderated against relevant constraints. The letter from Brandon Lewis is clear that the outcome of a SHMA is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans.

**Option 3.** It is difficult to assess the weight that should be attached to the OAN before the assessment of constraints and opportunities has taken place at the level of the HMA. The objective will be to meet the full OAN in the HMA, as far as is consistent with national policy. All options for doing this will be considered, including strategic cross boundary opportunities.

West Berkshire does, however, have considerable constraints. Three quarters of the District lies in the North Wessex Downs AONB and the Core Strategy has already set limits to growth in this part of the District in the period to 2026. The Eastern Urban area is constrained by the immediately adjacent AONB boundary and by extensive areas subject to flooding. These constraints have impacted on the potential to meet the approximate Core Strategy requirement in the Eastern Area in the HSA DPD. In the East Kennet Valley, the rural service centres of Mortimer and Burghfield Common have relatively poor transport connections and there are constraints associated with the presence of two AWE bases at Aldermaston and Burghfield. The Newbury and Thatcham area has perhaps the greatest potential for growth, but there are constraints associated with infrastructure provision, areas subject to flooding and the need to respect the historic environment. To the west of Newbury is a designated Historic Battlefield and the town already has two allocated strategic urban extensions to the south and east.

It would seem a reasonable option therefore to consider an intermediate requirement as a provisional or first phase requirement until the new Local Plan establishes the housing requirement for the longer period up to 2036. A requirement of 595 dwellings per annum, mid-way between the Core Strategy requirement and the OAN, would demonstrate a significant boost to the requirement and could potentially establish a basis for calculating the five year housing land supply.

**Option 4.** The PPG is clear that household projections published by DCLG should provide the starting point estimate of overall housing need. The SHMA has used the latest 2012-based projections, re-based to 2013 and adjusted to incorporate the assumption of an increased net migration from London post 2017.

The projections are based on trends, they provide an estimate of the household growth that would result if the assumptions based on previous demographic trends and rates of household formation were to be realised in

practice. But as the PPG is clear that employment trends and market signals also need to be taken into account in the assessment of the OAN it would be difficult to justify use of the demographic led projection when there is a robust and recent assessment of full housing needs.

The table below sets out the requirement for each scenario. The base date of the SHMA is 2013 so requirements are calculated from that date. The SHMA is an integrated assessment which captures the impacts of past under-provision of housing where relevant; therefore there is no need to include any backlog or under-provision prior to 2013.

Housing Requirement 2006 to 2026 (Net dwellings)		
Core Strategy Requirement	10,500	
Requirement based on OAN	12,079	Completions 2006 to 2013 (3,434) plus 13 years @665 dpa
Intermediate Requirement	11,169	Completions 2006 to 2013 (3,434) plus 13 years @595 dpa
Demographic Led Projection	10,597	Completions 2006 to 2013 (3,434) plus 13 years @551 dpa

The table below sets out how far the proposals in the HSA DPD will go towards meeting these requirements, based on monitoring information at March 2015 and on the sites proposed for allocation in the HSA DPD.

Land Supply 2006-2026 (Net dwellings)	
Completions to March 2015	4,387
Planning permissions + 1,000 units on allocated site at Sandleford Park	3,982
Identified sites, including those identified through prior approval process	449
Windfall allowance (to 2026 in the AONB and to 2021 in remainder of District)	564
Proposed allocations	1,575 – 1,605
Total	10,957 -10,987

There does need to be flexibility built into the housing supply. The figures above do not include any allowance for non-implementation of permissions or for sites not coming forward as anticipated. On the other hand there is the flexibility for additional housing to boost this supply. This includes :

- Windfall – other than for the AONB, there is no windfall allowance included beyond the first five years. Windfalls will continue to add to supply. The windfall allowance has been based on trend information from 2009 to 2015 (See Appendix A). If these trends continue, approximately 300 additional units would be anticipated as windfall deliveries outside the AONB from 2021-2026. These figures also

exclude windfalls on residential gardens, which on past trends average approximately 20 dwellings per annum.

- Identified sites – only a very limited number of sites have been included in the supply due to uncertainty over timing of likely delivery. Additional sites such as the London Road Industrial Estate are likely to add to the housing supply and new sites will continue to be identified through updates to the SHLAA.
- Settlement boundaries – the HSA DPD proposes some changes to the settlement boundaries of the settlements in the settlement hierarchy. These will provide additional opportunities for small scale development.
- Sandlesford Park – this site was allocated as a strategic site in the Core Strategy. Delivery will continue beyond the current plan period but there is potential to deliver above the 1,000 units currently in the supply for the period to 2026.
- Additional permitted development through the prior approval process. The government has recently announced that changes to permitted development, allowing conversions of offices to residential use, will become permanent.

The supply figures demonstrate that the allocations in the HSA DPD will enable the Core Strategy requirement to 2026 to be met and will go a long way to meeting any requirement based on the OAN. The majority of the sites proposed for allocation in the Draft Submission DPD are anticipated to deliver within the first five years. The supply would be sufficient to meet the full OAN for at least the period up to 2023 and the intermediate requirement up to 2025. By that time the Council will have a new adopted Local Plan in place, with additional housing allocations. The intention of this DPD was always to boost supply in the short to medium term in accordance with the distribution set out in the adopted Area Delivery Plan Policies. The new Local Plan will establish the revised housing requirement and show how this can be met over the longer term.

The five year housing land supply position will be updated regularly and will assess which individual sites, including those proposed allocations in the Draft Submission HSA DPD, have potential for delivery within the five year period.

## **9. Development on brownfield land**

The Core Strategy states that most development will be on brownfield land and contains a target that at least 60% of new development over the plan period should be on previously developed land (PDL). A number of representations to the preferred options document raised issues relating to the identification of brownfield land.

Up to March 2015 almost 83% of new dwellings were developed on PDL and the Council anticipate that additional sites will come forward during the plan period on sites that have been previously developed, whether windfall or sites previously identified. But the Council need to show that sites are deliverable and this plan is aimed at boosting supply in the short to medium term and meeting the first part of longer term needs identified in the SHMA. A limited

number of brownfield sites without planning permission have been included in the supply. These include sites that have been identified through the prior approval process and sites that the Council is confident will come forward in the short term. The table below gives a breakdown of the percentage of brownfield land in each of the categories of land supply and shows that 65% of the land supply is on PDL.

#### Housing Land Supply – Previously Developed Land

<b>Total 2006 - 2026</b>	No. dwellings on PDL	No. Dwellings on Greenfield	Total	Percentage on PDL
Completions to March 2015	3,624	763	4,387	83
Sandleford Park	0	1,000	1,000	0
Sites with planning permission	2440	542	2,982	82
Identified sites including prior approvals	449	0	449	100
Windfall allowance	465	99	564	82
HSA DPD sites	140	1435	1575	9
	7,118	3,839	10,957	65

### 10. Stratfield Mortimer Neighbourhood Development Plan

Stratfield Mortimer Parish Council is preparing a Neighbourhood Development Plan (NDP) for the Parish. At the Housing Site Allocations DPD preferred options stage, two options were considered and the option of Stratfield Mortimer being given a housing number of at least 100 dwellings and having responsibility for allocating sites for development through the NDP, in conformity with the policies of the Core Strategy is being taken forward. The NDP for Stratfield Mortimer is therefore allocating a site/s to fulfil the requirement set out above with the intention of providing 110 dwellings. The NDP is well progressed, and when adopted, will form part of the development plan for West Berkshire. The NDP will also include a review of the settlement boundary of Mortimer.

### 11. Housing Sites Selection Process

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

reasonable alternatives. Further technical information and comments from the parish and town councils were taken into consideration before officer recommendations for potential allocations were made to the Planning Policy Task Group, before the preferred options version of the DPD was approved by Council for consultation.

Following the proposed options consultation, changes have been made to the site assessments and SA/SEAs to reflect both the outcomes of the consultation and the additional technical work that had been carried out. This has, in some cases, changed the recommendation about whether or not a site should be allocated.

The changes to the site assessments and the SA/SEAs that have been made since the preferred options stage have been made as tracked changes so that it is straightforward to see what has changed.

## **12. Approach to meeting the requirement for Gypsies, Travellers and Travelling Showpeople**

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

To provide the evidence to inform pitch provision, a Gypsy and Traveller Accommodation Assessment (GTAA) has been undertaken. This has been carried out by an independent consultant, using a shared methodology with other Berkshire authorities. The GTAA has assessed the requirement as 17 permanent pitches for gypsies and travellers and 24 for travelling showpeople over a 15 year period from 2014 to 2029.

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

During the preferred options consultation, additional information was received about some of the sites. This has been taken into account during the decision making process and has resulted in some changes to the proposed allocations. The DPD now allocates a site for Gypsies and Travellers at Paices Hill for 8 permanent pitches and a site for Travelling Showpeople at Longcopse farm in Enborne for 24 plots. A policy is included for each of these allocations. The site at Paices Hill meets the need for Gypsies and Travellers for the first 5 years of the Plan and for all but 2 pitches of the following 5 years up to 2024. Further work is underway on the Clappers Farm site that was

included as an allocation in the preferred options version of the Housing Site Allocations DPD. This site may have potential to accommodate the needs for Gypsies and Travellers in the longer term, and it is now included as an area of search for the future, rather than as an allocation. Further allocations will need to be made in a future Local Plan.

### **13. Policy Reviews**

#### **The need to review policies to guide development in the countryside**

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

The opportunity is being taken to review the policies that guide development in the countryside through the Housing Site Allocations DPD to ensure that they are up to date and fit for purpose. A separate period of consultation was held on the Housing in the Countryside policies, for a 6 week period during September and October 2014. The policies have since been updated to reflect the outcomes of consultation and to reduce some repetition. In some cases key points from the supporting text have been included within the policy itself. Once adopted, the policies will replace some of the existing saved policies of the Local Plan.

### **14. Reviewing the Residential Parking Standards**

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

The standards take into account the following elements:

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

The revised residential parking standards have been updated following the consultation, and there are now a smaller number of zones which better reflect the evidence.

## **15. Reviewing the Settlement Boundaries**

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

Criteria for reviewing the settlement boundaries formed part of the preferred options consultation and are set out in Appendix D.

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

## **Appendix A**

### **Meeting the Housing Requirement**

The tables below set out the housing requirement for each spatial area and how this can be met. The latest monitoring data is for March 2015 and the tables show the position as at 31 March 2015.

The requirement for each spatial area other than for the AONB is an approximate requirement; for the AONB it is a maximum requirement, as set out in the Core Strategy.

In addition to the completions and outstanding planning permissions, the supply includes the allocated sites at Sandford Park (1,000 dwellings assumed in the plan period up to 2026) and identified sites.

The identified sites include those identified through the prior approval process. Changes of use from office developments to residential can take place as permitted development, subject to a determination about whether prior approval is needed with regards to transport and highways impacts of the development, contamination risks and flooding risks on the site. A number of these schemes have been completed or are under construction as this change to the General Permitted Development Order was intended to be temporary, with the change of use begun by 30 May 2016. The government has recently announced that the changes are to become permanent.

In addition to these sites the supply includes:

- Market Street development. This is an important component of the Newbury Vision and the Council anticipates a planning application for the site later in 2015. A community planning event was held earlier this year and the proposals were outlined to the public at an event in September. The proposals are for at least 200 new homes
- Pound Lane Depot, Thatcham. The Council is in the process of selling this site to a house builder for the development of approximately 47 new homes.

A windfall allowance has been applied in all spatial areas, based on past trends. In the AONB a windfall allowance has been included up to 2026 because of the housing requirement of “up to 2,000”. In other spatial areas the windfall allowance is included only for the first five years, to March 2021. The calculation of the windfall allowance is set out below.

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

There is also considerable flexibility in the housing supply figures as outlined in Section 8, including the potential for additional windfall for the later part of

the plan period, additional identified sites coming forward, opportunities for small scale development as a result of settlement boundary changes and potential flexibility of delivery at Sandlesford Park.

## Newbury/Thatcham

<b>Housing Requirement</b>	<b>6,300 approx.</b>
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<b>Housing Supply at March 2015</b>	
Dwellings completed at March 2015	2,453
Dwellings with permission at March 2015	2,182
Sandleford Park – allocated strategic site	1,000
Identified sites, including those identified through prior approval process	420
Windfall allowance in 5 year supply	207
<b>Proposed Allocations</b>	
HSA DPD draft allocations	525 -555

## Eastern Urban Area

<b>Housing Requirement</b>	<b>1,400 approx.</b>
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<b>Housing Supply at March 2015</b>	
Dwellings completed at March 2015	324
Dwellings with permission at March 2013	471
Identified sites, including those identified through prior approval process	4
Windfall allowance in 5 year supply	27
<b>Proposed Allocations</b>	
HSA DPD draft allocations	365

## AONB

<b>Housing Requirement</b>	<b>2,000 max</b>
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<b>Housing Supply at March 2015</b>	
Dwellings completed at March 2015	1,138
Dwellings with permission at March 2015	240
Identified sites, including those identified through prior approval process	21
Windfall allowance in 5 year supply	128
Windfall allowance 2021 - 2026	156
<b>Proposed Allocations</b>	
HSA draft	385

## East Kennet Valley

<b>Housing Requirement</b>	<b>800 approx.</b>
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<b>Housing Supply at March 2015</b>	
Dwellings completed at March 2015	472
Dwellings with permission at March 2015	89
Identified sites, including those identified through prior approval process	4
Windfall allowance in 5 year supply	46
<b>Proposed Allocations</b>	
HSA DPD draft allocations	300

## Calculation of the Windfall Allowance

The NPPF states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment (SHLAA0, historic windfall delivery rates and expected future trends.

The Council has examined past records of permissions and completions in order to derive a realistic windfall allowance. The first SHLAA was produced in 2009 and from then onwards the Council has classified sites that were not identified in the SHLAA as windfall sites. Prior to 2009/10 windfalls, for this purpose, are taken to be equivalent to small site permissions. Taking an eight year period from 2007/08 to 2014/15 the average number of permissions granted on windfall sites was 139 net units per annum.

Net Windfall Permissions 2007/08 to 2014/15	
2007/08	163
2008/09	143
2009/10	130
2010/11	126
2011/12	112
2012/13	152
2013/14	111
2014/15	176
Average 2007/08 to 2014/15	139

The NPPF states that the windfall allowance should not include residential gardens. Prior to June 2010 sites involving the curtilage of private residential gardens were classified as previously developed land. Permissions granted on residential sites since June 2010 have been classified by the Council as greenfield if less than 50% of the proposed footprint is on the footprint of a former dwelling. These have been identified as residential garden (RG) in the residential commitments schedules. Over the period 2009/10 to 2014/15 units permitted on private gardens were equivalent to 15.2% of total gross windfall permissions.

The Council has therefore calculated its windfall allowance based on a net figure of 139 units per annum, assuming 15.2% of these are on residential gardens to give a windfall allowance of 118 net permissions per annum ( $139 \times 0.848 = 117.9$ ). By calculating the allowance based on new permissions there is no double-counting of sites already in the supply.

The Council has looked at the pattern of delivery from windfall sites from 2008/09 to 2014/15 to apply an annual windfall allowance in the five year housing land supply. This allowance has a built in non-implementation allowance of 15% for sites that may lapse or deliver after the five year period.

Based on past trends 8% of permissions are assumed to be developed in the year of permission (the current year), 28% in year 1, 24% in year 2, 15% in year 3, 9% in year 4 and 1% in year 5.

The spatial pattern of windfall permissions over the period from 2008/09 has also been monitored. The percentages of windfalls in each spatial area are set out in the table below. These have been used to derive the windfall allowance for each spatial area.

Percentage of Total Windfalls permitted in Spatial Areas 2008/09 to 2014/15	
Newbury/Thatcham Area	51%
Eastern Area	7%
East Kennet Valley	11%
North Wessex Downs AONB	31%

## **Appendix B: Site Selection Process**

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

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

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

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

Sites in the SHLAA were assessed as:

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

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

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

This assessment has two phases: Firstly all sites are assessed against 'automatic exclusion' factors. This determines which should progress further and which should be ruled out. These criteria cover significant issues such as where a site is too small to be allocated, or where a site's size would be out of

keeping with a settlement's size and function within the settlement Hierarchy. Also included are those sites within the settlement boundary, where there is a presumption in favour of development and therefore no requirement to allocate. Other criteria include factors that make a site unsuitable for development, such as significant flood risk (flood zone 3) or a national or international environmental or historical protection (including SSSIs, SACs, SPAs, Registered Battlefields or Historic Parks and Gardens). The impact on the AONB is also considered at this stage of site selection.

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

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

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

### **Automatic Exclusion**

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

### **Considerations**

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

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

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

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

**Parish and Town Council comments**

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

Following the preferred options consultation any changes to the Site Assessments are shown as tracked changes in the SA/SEA.

## Appendix B1

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

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

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

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

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

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

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



## Appendix C: Approach to site assessments for Traveller sites

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

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

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

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

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

### Criteria as set out in Policy CS7 of the Core Strategy

Policy CS7 Criteria	Key considerations
Safe and easy access to major roads and public transport services	<ul style="list-style-type: none"><li>• Whether access is of, or can be made to, an appropriate standard, including consideration of its adequacy, the character, width, alignment and speed of the road</li><li>• 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</li><li>• Access to public transport and the frequency of the service</li><li>• Any other highway issues or concerns</li></ul>

<p>Easy access to local services including a bus route, shops, schools and health services</p>	<ul style="list-style-type: none"> <li>• Whether local services, including a bus route, shops, schools and health services are located in a nearby settlement</li> <li>• Distance to key local services (as above) and whether they are accessible by walking and/or cycling or accessible by public transport</li> </ul>
<p>Located outside areas of high flooding risk</p>	<ul style="list-style-type: none"> <li>• Whether the site is located within Flood Zone 2 and/or 3</li> <li>• Whether the site is vulnerable to other sources of flood risk, such as surface water or ground water flooding</li> <li>• Whether evidence suggests there are flood risk issues affecting the site and/or its immediate surroundings</li> </ul>
<p>Provision for adequate on site facilities for parking, storage, play and residential amenity</p>	<ul style="list-style-type: none"> <li>• Size of the site</li> <li>• Any existing facilities/structures on the site</li> <li>• Potential number and density of pitches</li> </ul>
<p>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</p>	<ul style="list-style-type: none"> <li>• Distance from the site to nearest residential properties / settled community</li> <li>• Whether the amenity of neighbouring uses would be unacceptably affected by Gypsies and Travellers (noise, light, visual impact, general disturbance etc) and vice versa</li> </ul>
<p>Opportunities for an element of authorised mixed uses</p>	<ul style="list-style-type: none"> <li>• Whether a mix of uses and/or alternative uses have been proposed on the site.</li> <li>• Whether the site and its surrounding uses would lend itself to an element of authorised mixed uses.</li> </ul>
<p>The compatibility of the use with the surrounding land use, including potential disturbance from vehicular movements, and on site business activities</p>	<ul style="list-style-type: none"> <li>• Type and scale of surrounding uses</li> <li>• Whether the amenity of neighbouring uses would be unacceptably affected by Gypsies and Travellers (noise, vehicular movement etc)</li> <li>• Number of expected vehicle movements from site depending on proposed number of pitches and/or on site business activities</li> </ul>

Will not materially harm the physical and visual character of the area	<ul style="list-style-type: none"> <li>• Visual prominence and visual impact of the site</li> <li>• 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</li> </ul>
Where applicable have regard for the character and policies affecting the North Wessex Downs AONB	<ul style="list-style-type: none"> <li>• Whether the site is located within the North Wessex Downs AONB</li> <li>• Whether there is likely to be any impact on features that contribute to the landscape character</li> <li>• Whether development of the site will contribute to the conservation and enhancement of the natural beauty of the landscape</li> </ul>
Other issues to consider	<ul style="list-style-type: none"> <li>• Any site specific or local issues to be considered</li> </ul>

In addition to assessing each site against the criteria set out within the policy, regard has also been had to the relevant national guidance, including the NPPF and PPTS. A SA/SEA has been carried out on each site to determine the potential effects on social, economic and environmental sustainability.

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

Following the preferred options consultation any changes to the Site Assessments are shown as tracked changes in the SA/SEA.

## Appendix D: Settlement Boundary Review Criteria

1. The settlement boundary should only enclose the main settlement area i.e. the area of close knit physical character. Areas of isolated development which are physically or visually detached from the settlement or areas of sporadic dispersed or ribbon development are excluded.
2. Clearly identifiable features should be used in drawing the boundary (e.g. buildings, field boundaries, roads, rivers, curtilages). Settlement boundaries should exclude large gardens, orchards and areas which are functionally separate to the dwelling, or visually open and related to the open countryside where development could significantly extend the built form of the settlement and as such would result in ribbon development or coalescence.
3. Tree belts, woodland areas, hedges and other natural features which help to soften and screen existing development and form a boundary to the settlement should be excluded from the settlement boundary or protected in some other way.
4. Highly visible areas such as exposed ridges, land forms or open slopes on the edge of settlements should normally be excluded from settlement boundary areas.
5. Recreational or amenity open space which is physically surrounded by the settlement (or adjoined on three sides by the settlement) is included within the settlement boundary. Where recreational or amenity open space extends into the countryside or primarily relates to the countryside in form and nature is excluded from the settlement boundary.
6. Open undeveloped parcels of land on the edges of settlements should normally be excluded from defined settlement areas
7. The wider setting and important views both into and out of the settlement should, where appropriate, also be taken into account
8. Existing community facilities (such as churches, schools and village halls) which are physically related to the settlement should be included within the settlement boundary
9. Employment and leisure uses located on the edge of settlements will be considered according to their scale, functionality and relationship to the settlement
10. Development areas within the strategic sites allocated in the Core Strategy and sites allocated through the Housing Site Allocations DPD are included in the settlement boundary.