TOPIC PAPER TO SUPPORT THE POST-EXAMINATION PROPOSED FOCUSED CHANGES TO THE CORE STRATEGY

Introduction

This topic paper has been prepared in order to support the post examination proposed focused changes consultation for the West Berkshire Core Strategy.

These are the outcome of additional work on the Core Strategy which was necessary following the suspension of the Examination in November.

The Core Strategy examination began on 2 November 2010 and ran for 8 days. Under Inspector guidance, the Council asked for a suspension to the Examination at the end of the scheduled hearings to enable the Council to consider matters that had arisen from the discussions. The Examination was suspended on 11 November to enable the Council time to undertake the extra work that the Inspector had asked for

The Inspector published 2 notes (available on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=20791) setting out matters highlighted in discussions at the hearings, with further work suggested for the Council to undertake. This has resulted in some focused and some minor changes to the submitted Core Strategy.

The focused changes require consultation under regulation 30 of the Planning and Compulsory Purchase Act 2004, Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. The consultation will take place between 4 February and 18 March 2011. A schedule of responses will then be prepared and sent to the Inspector. Any minor amendments do not require consultation.

The Examination will then resume to allow the additional information to be examined. The Inspector has indicated that in terms of his timescales, the Examination process could resume on 2 May, with further hearing sessions to be held in late June/early July.

A sustainability appraisal has been carried out on the focused changes and this is also available as background information. The updated SHLAA and the detailed landscape sensitivity analysis is also available as part of the consultation.

Inspector's Post Hearing Note 1

1. The planning response to the Atomic Weapons Establishment (AWE) at Aldermaston and Burghfield and the advice from the Health and Safety Executive (HSE)

1.1. Following the suspension of the Examination a meeting was held between representatives of the Heath and Safety Executive Nuclear Installations Inspectorate (HSE NII), Health and Safety Laboratories (HSL), Basingstoke and Deane Borough Council, Reading Borough Council, Wokingham Borough Council and West Berkshire Council at the end of November. The minutes of this meeting have been submitted to the Inspector and will be included on the list of Core Documents.

1.2. Details of all developments with planning permission and those which had been allocated in an approved DPD where then forwarded to the HSL for inclusion in their modelling work in December.

1.3. The HSE NII, has responded to West Berkshire Council stating that the proposal for an additional 330 dwellings in the East Kennet Valley in the Burghfield Common and Mortimer area "***has no impact*** *on the site population factors for AWE Burghfield. Accordingly, HSE can conclude that these forecasted levels of population, for residential development between now and 2016 and beyond to 2021 based on the very speculative forecasts, can be accommodated without breaching the semi urban population criteria for constraint limits*" (West Berkshire Council emphasis).

1.4. The Council has introduced a new policy and changes to the proposals map to reflect this.

Zone of Extendibility

1.5. During the course of the examination the issue of an extendable Detailed Emergency Planning Zone (DEPZ) was raised in relation to evacuation purposes and the emergency plan. This issue has not been raised before by the HSE with the West Berkshire Emergency Planning Officer or by any of the "Blue Light Services", it has also not been used by the HSL in the additional modelling work recently undertaken and it is not referred to in the HSE letter or appendices.

1.6. The Council has therefore not included any proposals relating to the zone of extendibility.

Inspector's Post Hearing Note 2

1. Justification of the Overall Housing Provision

1.1. This section of the topic paper addresses the approach to the level of housing provision to be included in the Core Strategy. It has been produced in the light of changes to national planning policy and following the discussion at the examination hearing on Main Matter 3: Overall Housing Provision, Distribution and Delivery on 3 November 2010. The paper addresses the matters raised in the Inspector's note of 15 November 2010. The Inspector, in this note, considered that the Council had not sufficiently drawn conclusions on the factors that should be taken into account in determining the appropriate level of housing.

1.2. This paper therefore covers the factors that have influenced the proposed level of housing provision and how the Council has weighed the evidence to conclude that the Submission Core Strategy contains the most appropriate provision for the District.

Changing National and Regional Policy Context

1.3. Preparation of the Core Strategy commenced in the context of an emerging Regional Spatial Strategy (RSS) for the South East. The draft RSS published in March 2006 indicated that 10,500 homes, an average of 525 dwellings per annum should be built in West Berkshire from 2006 to 2026.

1.4. The emerging South East Plan was subject to an Examination in Public in November 2006 – March 2007. The report of the examination panel recommended to the Secretary of State an increase of 7,500 homes in West Berkshire, specifically to accommodate a strategic development area at south Reading (north of the M4).

1.5. This proposed increase for West Berkshire was not subject to a sustainability appraisal and was not carried through into the South East Plan adopted in May 2009. The location proposed for the strategic development area was primarily in the functional floodplain and the prospective developer has since indicated that the site is no longer considered viable for this scale of development. The consortium and landowner agreement has been terminated.

1.6. The adopted South East Plan contains a housing target, in Policy H1: Regional Housing Provision, of 10,500 dwellings, an average annual provision of 525 net dwellings. Most of West Berkshire lies within the Western Corridor and Blackwater Valley sub-region. Policy WCBV3: Scale and Distribution of Housing Development sets out the requirement for 9,500 dwellings in this part of the District with the remaining 1,000 dwellings, an average of 50 additional units per annum, to be provided in the area outside the Western Corridor (AOSR1).

1.7. With the change in Government, the new Secretary of State made clear his intention to abolish Regional Spatial Strategies. The revocation of the RSS on 6 July 2010 was quashed by the High Court and the RSS re-instated as part of the Development Plan in November 2010. This was during the course of the examination hearings into the West Berkshire Core Strategy, but after the discussions on the overall housing provision had taken place. Though the Government has clearly signalled its intention to abolish all RSSs through the publication of the Localism Bill in December 2010, the South East Plan will still be in place when the Core Strategy hearings resume in the summer of 2011.

1.8. Section 19 of the 2004 Act deals with the preparation of local development documents (LDD) and 19 (2) states that a local planning authority must have regard to: (a) national policies, (b) the regional strategy (f) the sustainable community strategy, (i) the resources likely to be available for implementing the proposals in the document and (j) such other matters as the Secretary of State prescribes.

1.9. Furthermore, Section 24 (1) specifies that a LDD must be in general conformity with the regional strategy, this requirement is also repeated in PPS 12.

Consultation and Council's approach to West Berkshire's Housing Requirement

1.10. The original figure submitted to the Regional Spatial Strategy examination was 10,500 additional dwellings over the plan period (the Option 1 number). This represents a continuation of the requirement in the former Berkshire Structure Plan 2001 - 2016 and was the figure recommended by the Council in 2005, following public consultation between September and October 2005 on the Draft South East Plan. It was assessed as a balanced level of development, taking into account demographic needs of the community and the ability to deliver housing, whilst allowing for a realistic and deliverable amount of affordable housing through the planning system. With regard to economic needs the 525 per annum figure was considered by the Council to be appropriate to foster the economy and allow for the local workforce.

1.11. The figure of 525 dwellings per annum was also agreed by the other Unitary Authorities in Berkshire as appropriate in meeting the needs of the economy, the needs of the community whilst reflecting the environmental constraints of the District.

1.12. The Council responded to consultation on the South East Plan in 2006 with broad support for the majority of the principles, including the scale and distribution of housing in the sub-region, subject to environmental designations being properly addressed and the provision of appropriate infrastructure.

1.13. The Council consulted on the Core Strategy "Options for Delivering Homes" in November 2007. At that time, the report of the Panel into the South East Plan had been published. The Council took the approach that in looking at potential options, it should be looking at how the 10,500 dwellings requirement could be met and this formed the basis of the consultation. The additional 7,500 homes recommended by the Panel were specifically associated with the expansion of Reading and the location, which was primarily in the functional floodplain, broadly identified in the Panel Report. The "Options for Delivering Homes" consultation document estimated that sites for approximately 4,000 dwellings would need to be identified through the LDF process in order to ensure delivery of the 10,500 dwelling requirement of the emerging South East Plan.

1.14. The "Options for the Future" consultation in April 2009 proposed to plan for the delivery of approximately 11,000 homes. This was in order to meet the South East Plan requirement plus an allowance for under-provision of 451 units in the plan period up to 2006. At that time there was uncertainty over whether any under- or over-provision had been included within the South East Plan figure, and the Council wanted to ensure flexibility was built into the Core Strategy. In October 2009 the Government Office confirmed that the 2006 RSS baseline figures included an estimate for previous undersupply (CD07/28). In the light of this, the Proposed Submission Core Strategy proposed provision be made for approximately 10,500 new homes, to conform to Policy H1 of the South East Plan. This figure was not intended to be a ceiling but a deliverable target, with the Core Strategy demonstrating how this could be met with flexibility built in to respond to changing circumstances or requirements.

1.15. The requirement to conform to the South East Plan remains as a legal requirement under the Planning and Compulsory Purchase Act 2004 S20(5)(a), as the RSS forms part of the Development Plan. Nevertheless the Council has carried out some further analysis of the factors set out in PPS3 to justify the level of housing required, including recent information and policy directions which were either not available or apparent at the time of submission of the Core Strategy. The explanatory text to Policy CS1 in the Core Strategy has been expanded to clarify the decision of the Council to retain the 10,500 new home requirement in conformity with the adopted South East Plan.

Assessing an appropriate level of housing for West Berkshire

1.16. On revocation of the RSS, guidance (CD11/01) was issued to local planning authorities to clarify how they could continue to bring forward their LDFs. On the issue of housing provision this guidance is clear that local planning authorities will be responsible for establishing the right level of housing, that the process needs to be transparent and that policies will need to be justified and defended during the LDF examination process. Despite the Court's verdict on the legality of the revocation, the advice from the Department for Communities and local Government (DCLG) is that planning authorities should still have regard to the intention to abolish Regional Strategies in the Localism Bill as a material consideration in planning decisions.

1.17. Pending the introduction of the Government's new National Planning Framework, PPS3 has been retained. Paragraphs 32 to 35 of the PPS, last published in June 2010, set out the approach to assessing an appropriate level of housing. However, the approach in the PPS is still based on the regional structure and not all of this section is therefore directly applicable to the determination of an appropriate level of housing by local planning authorities.

1.18. Paragraph 32 states that the level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional and national policies achieved through widespread collaboration with stakeholders. The Council believes that the level of 10,500 additional dwellings has been determined in this manner, subject to significant consultation and to prior examination through the South East Plan as well as the Core Strategy.

1.19. Paragraph 33 of PPS3 refers to a number of factors to be taken into account in determining housing provision which continue to have relevance. These are:

- Evidence of current and future levels of need and demand for housing and affordability levels based upon:
  - Local and sub-regional evidence of need and demand[1], set out in Strategic Housing Market Assessments and other relevant market information such as long-term house prices.
  - Advice from the National Housing and Planning Advice Unit (NHPAU) on the impact of the proposals for affordability in the region.
  - The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.
- Local and sub-regional evidence of the availability of suitable land for housing using Strategic Housing Land Availability Assessments.
- The Government's overall ambitions for affordability across the housing market area, including the need to improve affordability and increase housing supply.
- Sustainability Appraisal
- An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.

1.20. Paragraphs 34 and 35 relate to Regional Spatial Strategies. Paragraph 34 states that the RSS should set out the level of overall housing provision to enable local planning authorities to plan for housing over a period of at least 15 years. This level has been set out for West Berkshire in the South East Plan.

Factors set out in PPS3 Paragraph 33

Evidence of current and future levels of need and demand for housing and affordability levels.

Local evidence of need and demand

1.21. The Council's evidence base for housing affordability and housing need is set out in the Berkshire Housing Market Assessment (HMA) of 2007 (CD09/14). Because of the timing of this study in relationship to the preparation of regional and local plans, the objective of the HMA and associated housing needs assessment was about informing the elements of policy that were not yet determined, including the type and tenure of development rather than the overall number of new dwellings.

1.22. The HMA found that Berkshire is split into two housing markets, one in the east strongly influenced by London, and one in the west (West Central Berkshire) comprising Reading, Wokingham, Bracknell Forest and West

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[1] PPS3 Annex B defines housing demand as the quantity of housing that households are willing and able to buy or rent.

Berkshire. The West Central housing market area is more self-contained with Reading as the main employment centre. The HMA brings out the strong functional relationship between West Berkshire, Reading and Wokingham, supporting the strategic approach to assessing housing requirements.

1.23. The HMA looks at the drivers of the housing market, both housing demand and housing need. It examines population and household formation as well as external and economic drivers of demand and the historic supply of new housing. The HMA is clear that economic growth in the area will be contingent upon the provision of an increased supply of new dwellings, given that activity rates at the time were high and unemployment low in the housing market area. It also is clear that the provision of housing on the scale envisaged in the RSS is challenging, particularly if market conditions change (this was written in 2007) and that a key challenge to delivering the allocation appears to be environmental, given the extensive areas of land with high-order environmental designations. It should also be noted that the HMA did not take account of the HSE NII issues surrounding AWE.

Affordability

1.24. Appendix A of the HMA sets out the methodology of the Housing Needs Assessment and Appendix B presents the calculation by Unitary Authority. Estimating the number of households unable to afford to meet their housing needs in the housing market is a key element of understanding the nature of the local housing market and formed an integral part of the Berkshire HMA.

1.25. The estimates were produced in accordance with the methodology in the CLG draft Housing Market Assessment Guidance. A minimum and upper estimate of housing need was calculated for each authority. Housing need in West Berkshire was assessed at a minimum of 560 and a maximum of 730 units per annum under a baseline scenario. Alternative scenarios illustrated housing need if household growth were to occur above the projections current at the time. Assuming a 50% increase in population growth, the housing need was estimated to be between 680 and 850 units per annum.

1.26. The key conclusion of the assessment is that the level of need in each authority and across Berkshire as a whole far exceeds what can realistically be delivered in the future in terms of affordable housing supply, and also exceeds the total housing allocation for Berkshire.

1.27. The HMA stresses that the ability to deliver new affordable housing and create mixed communities is highly dependent on the delivery of new market housing. Though the HMA does not consider the issue of overall demand for housing it points out the importance of the Berkshire authorities remaining on track to adopt local development documents, particularly in relation to the allocation of sites.

House Prices

1.28. West Berkshire has traditionally been an expensive place to buy property. While the economic downturn has seen house prices fall slightly, they remain consistently some £50,000 higher than the national average. The HMA identifies the influence of London with the highest house prices in the Berkshire area in the eastern half of West Berkshire and in the Royal Borough of Windsor and Maidenhead. The need for affordable housing is far greater than the market's ability to deliver, having a knock-on effect on other aspects of the District, such as the economy, health and education.

Advice from the National Housing and Planning Advice Unit (NHPAU) on the impact of the proposals for affordability in the region.

1.29. The advice from the NHPAU relates to the region as a whole and is no longer applicable to the local determination of the appropriate housing requirement. The NHPAU was recently closed by the Government and its advice on the impact of proposed housing levels in West Berkshire cannot be sought.

1.30. Nevertheless recent reports published by the NHPAU contain some useful pointers to interpreting the evidence for housing demand. The Advice Unit's paper[2] of May 2009 looked at the impact of the changing economic context and the national household projections released in March 2009. These projections indicate a higher level of household growth compared to the previous 2004-based projections, with the growth attributable to net in-migration accounting for two-fifths of the total. The paper concludes that accessibility to both the market and social sectors has dramatically contracted, whilst housing pressures continue to rise. Levels of building are dropping to historically low levels across the country, whilst projections of future housing requirements are rising. It emphasises how critical it is to get delivery moving by having the right plans in place, based on long term requirements, not distorted by current events.

1.31. The NHPAU published two papers in July 2009 commenting on the national picture. In the paper "Building the right homes in the right places"[3] the Unit highlights two main factors that are likely to have a significant impact on the number of extra homes we will need over the next 20 years: the likelihood that there will be more households wanting homes, even after allowing for the impact that the recession may have on net migration to the country and the impact of the recession on income growth, which is likely to dampen demand for housing for a number of years. These factors will to some extent cancel each other out with the net result likely to be a small increase in the number of homes we need to build. The report does point out the appropriateness of using housing market areas when deciding on allocations: it is not always possible or appropriate to build in the areas of greatest pressure as some places will have overriding environmental or physical constraints, and building homes in one area will also affect affordability across a wider geographical area.

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[2] Housing requirements and the impact of recent economic and demographic change: NHPAU, May 2009

[3] More homes for more people: building ;the right homes in the right places: NHPAU, July 2009

1.32. In the Unit's July 2009 advice on housing levels to be considered in regional plans[4] the central message is that the recession will have little impact on the number of homes that need to be built over the next 20 years. There are serious economic and social consequences if the supply and demand for housing is not brought back towards balance and the backlog of unmet need at the national level tackled. The NHPAU used their demographic method to derive a housing supply range to be tested. They advised that changes to the housing supply ranges should be set half-way between old figures and numbers suggested by latest demographic evidence. In the South East they advise testing a bottom of the range increase of 1% and top of the range increase of 8%.

The Government's latest published household projections

1.33. The Government's latest published household projections for West Berkshire are provided by the Department for Communities and Local Government (DCLG). The DCLG published its latest set of household projections on 26 November 2010 after the timetabled hearings for the West Berkshire Core Strategy had concluded. They were not, therefore, part of the evidence base on submission of the Core Strategy. Table 1 shows a comparison with previous sets of DCLG/ODPM projections which are based on the corresponding demographic trend-led Office for National Statistics (ONS) population projections. The 2008-based projections show an increase of 16,000 (27.1%) households over the plan period 2006 to 2026. These projections superseded the 2006-based sub-regional household projections (published in March 2009) which suggested an increase of 14,000(23.3%) households over the plan period, which in turn superseded the 2004 based projection (published in February 2008), of an increase of 9,000 (15.3%) households between 2006 and 2026. Neither the 2006- or 2008-based projections were available at the time the South East Plan was in preparation.

Table 1

DCLG/ODPM Household Projections	**Households (thousands)**		**Household Change 2006 - 2026**	
	2006	2026	Number	Percentage
2008-based (26 Nov 2010)	59	75	16,000	27.1
2006-based (11 Mar 2009)	60	74	14,000	23.3
Revised 2004-based (28 Feb 2008)	59	68	9,000	15.3

Source: Department for Communities and Local Government – Household Estimates and Projections

1.34. The household projections are highly dependent on the level and structure of population used as the baseline. The Revised 2004 Household projections used the information from the 2001 Census, whereas the 2006

[4] More homes for more people: advice to Ministers on housing levels to be considered in regional plans: NHPAU, July 2009

based and 2008 based household projections used the corresponding Mid Year Estimates. The projected level of household growth has increased substantially as population projections have also increased.

1.35. The 2008-based household projections and the corresponding ONS population projections for West Berkshire are considered high, largely because of the assumed high levels of projected in-migration. The population projections are discussed in more detail below.

Population Projections for West Berkshire

1.36. The Office for National Statistics has produced a series of demographically-led population projections which have increased substantially from the 2004- based (equivalent to a projected increase of 3.7% over the plan period) to the 2008-based projection (equivalent to a 19.1% increase).

Table 2

Projection	Projected Population in thousands				
	2006	2011	2016	2021	2026
2008-based		155.3	162.3	170.1	177.2
2006-based	148.8	153.9	159.2	164.7	169.9
2004-based	145.2	145.5	146.7	148.6	150.5
2003-based	144.9	146.4	148.6	151.3	153.8

1.37. The projections are based on past trends. They show what the population will be if recent trends continue. They do not take account of future Government policy or local development policies that have not yet been implemented and take no account of dwelling supply.

1.38. The components of population change in recent years are shown in Table 3 and illustrated in Figure 1. They show how net migration has increased in recent years. For each year in the period 1996 to 2003 out-migration exceeded in-migration but since 2003 net migration has been positive.

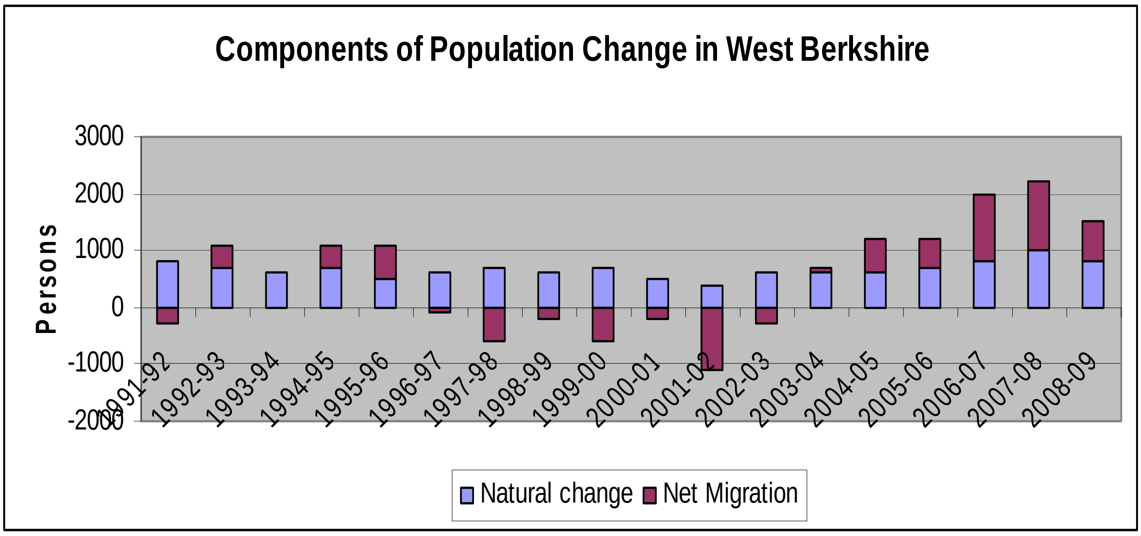
Table 3

	Natural change	Net Migration	Population
1991-92	800	-300	139,300
1992-93	700	400	140,400
1993-94	600	0	141,000
1994-95	700	400	142,100
1995-96	500	600	143,100
1996-97	600	-100	143,600
1997-98	700	-600	143,700
1998-99	600	-200	144,100
1999-00	700	-600	144,200
2000-01	500	-200	144,500
2001-02	400	-1,100	143,800
2002-03	600	-300	144,100
2003-04	600	100	144,800
2004-05	600	600	146,000
2005-06	700	500	147,200

2006-07	800	1,200	149,300
2007-08	1000	1,200	151,400
2008-09	800	700	153,000

Source: Office for National Statistics – Mid Year Population Estimates.

Figure 1



1.39. The ONS projections are based on recent trends which may not necessarily be repeated within the Core Strategy period. These include a high point in the economic cycle, high levels of in-migration and high levels of dwelling completions. In the period from 2004 to 2008 dwelling completions averaged almost 945 per annum in West Berkshire, a rate that is unsustainable over a longer period given the environmental constraints of the District.

1.40. The components of change from the ONS 2008-based projection are set out in Table 4 below. The high levels of internal migration, (that is moves within England) have implications for projected total population change, the age structure of the population and consequently the level of births.

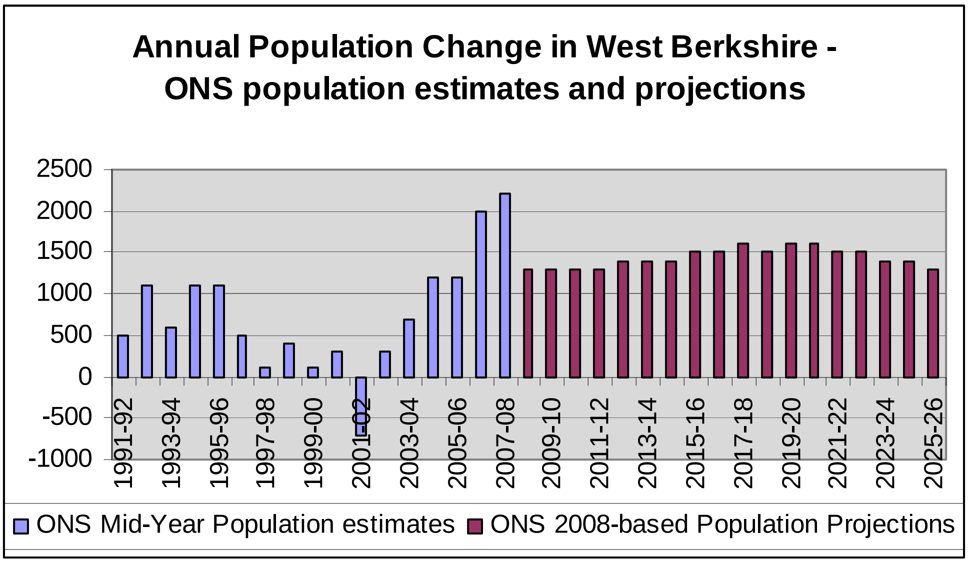
Table 4

Main components of population change in West Berkshire 2006 – 26: ONS 2008-based population projection

	Total change 2006 - 2026	Annual Average change 2006 – 2026
Natural change	14,800	740
Internal Net Migration	18,900	950
Cross border Net Migration	-1,500	-80
International Net Migration	-3,600	-180
Total change	28,400	1,420

1.41. Longer term population trends within West Berkshire have showed cycles of growth and stability and the recent growth in population, largely due to net in-migration, is not typical of growth over the past two decades. The ONS projections only use a short-term trend, the preceding five-year period, and therefore do not represent the longer term migration trends. Figure 2 below contrasts the estimated annual population change in the past with the continuous high levels of change suggested by the 2008-based ONS population projections.

Figure 2



Economic Growth Forecasts

1.42. West Berkshire is set within the Thames Valley - a buoyant economic sub-region. The District is surrounded by large towns which have been designated as Growth Points / Diamonds for Investment. Whilst the District can benefit from the knock-on effects of inward investment in these areas, West Berkshire seeks to continue to support its wealth of small and medium sized businesses, whilst encouraging large multi-national companies to locate in and remain located within the District.

1.43. The Employment Land Review (ELA, 2007) sets out the estimated supply of and demand for future employment land and floorspace in the District over the next 20 years.

1.44. Within the demand side the ELA takes the approach recommended within Government guidance note: Employment Land Reviews (ODPM, 2004), and sets out 3 approaches to estimate future requirements.

1. Labour Demand - estimates how the number of employees across different employment sectors could change in West Berkshire i.e. the demand for jobs.

2. Labour Supply - estimates the number of jobs likely to be required in different business sectors to meet the needs of future working residents, including an element of commuting (in and out), i.e. the availability of jobs.

3. Commercial led assessment - projection of recent trends in business property development in the District i.e. take up trends.

1.45. A best estimate of each use class was then taken forward to identify land requirements in West Berkshire.

1.46. These approaches are based on the regional growth forecasts and the delivery of 10,500 new homes over the Core Strategy period.

1.47. Economic forecasts produced by Cambridge Econometrics for the Berkshire unitary authorities in 2010 forecast a growth of just over 9,000 jobs between 2006 and 2026. Whilst Berkshire's complex commuting patterns do not encourage the drawing of too close a comparison between housing numbers and forecast economic growth, these figures do not suggest that the 10,500 housing figure is likely to worsen the balance significantly between the number of economically active residents and the number of local jobs over the Core Strategy period. Labour supply is not forecast to grow as fast as job growth because of stagnant activity rates and changing age structure, but the effects of the current recession and of later retirement ages are also likely to affect this balance.

Table 5
Forecasted Number of Total Jobs (Actual Numbers)

	2001	**2006**	**2011**	**2016**	**2021**	**2026**
West Berkshire	92,827	94,097	94,269	96,381	99,353	103,421
Berkshire	526,056	525,473	512,922	536,926	564,790	599,604

Source: Berkshire Observatory, Cambridge Econometrics 2010

Land Availability

1.48. PPS3 indicates that evidence of availability of suitable land for housing should be taken into account. Evidence regarding land availability has been drawn from residential commitments monitoring and from the Strategic Housing Land Availability Assessment (SHLAA), which includes an assessment of the five year deliverable supply.

1.49. These issues were subject to discussion in the examination hearings. The Council felt that it had demonstrated that sufficient sites had been identified to enable the delivery of the Strategy for each of the spatial areas, with sufficient alternative sites to enable choices to be made during the preparation of subsequent development plan documents.

1.50. The Inspector, however, felt that the Council had not produced a clear list of developable sites to demonstrate that the Core Strategy was deliverable, as the Council were relying on sites outside settlement boundaries, "currently not developable" to meet the requirement. The Council's approach had always been that the initial assessment contained within the SHLAA for these sites outside settlement boundaries and promoted by developers and agents, would be further evaluated through consultation and sustainability appraisals as part of the updated evidence base for the next stage of development plan preparation. The Sites Allocation and Delivery DPD would then allocate the smaller, non-strategic sites in conformity with the approved Core Strategy

1.51. The Council, at the Inspector's request, has therefore carried out further work on the SHLAA, particularly for the sites within the North Wessex Downs AONB, in order to produce a "basket of sites" which are considered potentially developable. This work is separately published and subject to consultation along with the proposed post-hearings changes to the Core Strategy. It demonstrates that there are potentially developable sites to more than meet both the total 10,500 requirement, and the requirements set out in the spatial policies for the different geographical areas of the District, with flexibility to make choices.

1.52. The Council is convinced that though land supply is not in itself a constraint, there are broader sustainability issues - environmental designations, flooding, AWE impact, historic environment, landscape character, infrastructure - which will pose constraints on overall development. The SHLAA only takes account of these to a limited degree as it makes an assessment of individual sites rather than the cumulative impact across the District.

1.53. In each of the geographical areas covered by the Area Delivery Plan Policies there are severe constraints on delivery. In the AONB, which covers three-quarters of the District, the conservation of the natural beauty of the landscape will be the paramount consideration, in accordance with the Council's statutory duty of regard to the purpose of designation of the AONB. Though the SHLAA has classified a number of sites as not developable on grounds of landscape impact, those remaining as potentially developable need to be seen as alternatives – in some settlements the potential cumulative impact of development would be considerable. The SHLAA has indicated where there are particular issues and choices to be made.

1.54. In the Eastern Area, development is limited by the fact that the AONB abuts the Eastern Urban Area settlement boundary along much of its length and the area south of Reading is in the functional floodplain. In addition there are issues of infrastructure, particularly transport impact to take into consideration.

1.55. In the East Kennet Valley there are issues related to the AWE sites, AWE Aldermaston and AWE Burghfield in the area, which have meant a relatively limited level of development is proposed. The situation with regard to AWE will continue to be monitored and reviewed in conjunction with the HSE NII and neighbouring local authorities.

1.56. It is the Newbury/Thatcham area which has the greatest development potential and where the majority of growth is proposed to be focused. Nevertheless, there are also substantial constraints in this area, including highways infrastructure, flooding and issues related to conservation, historical character and landscape quality. There would also be potential delivery issues if development were focused too heavily on one particular area of the District. Thatcham has experience rapid growth in the recent past and the Council's intention is that development over this Core Strategy plan period should be more modest.

Government's overall ambitions for affordability

1.57. PPS3 paragraph 9 sets out the Government's key housing policy goal to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this the Government is seeking to improve affordability, increase supply of housing and create sustainable, inclusive, mixed communities in all areas, both urban and rural.

1.58. The Coalition Government has attempted to revoke Regional Spatial Strategies and its intention remains to remove the regional targets for delivery of new homes as set out in the Localism Bill[5]. It is understood that this means the Government no longer retains a national target for delivering 3,000,000 homes by 2020 as set out by its predecessor. The new Government has not quantified its approach to improving affordability and to increasing supply. It has however indicated its intention to move from the target based approach to housing delivery to an incentive based approach.

1.59. The White Paper "Local growth: realising every place's potential"[6] states that one of the planning system's main functions is to provide sufficient housing to meet demand, but that the planning system has alienated communities through centrally imposed policies and targets and consequently is often seen as a barrier to development, despite the desire of almost every local community to see new homes, more jobs, extra investment and a better local environment (paragraph 3.2).

1.60. The Coalition Government therefore retains the objective of increasing supply to meet demand but believes that the drivers of growth are local and that decisions should be made at the local level. The Government has invited businesses and councils to come together to form Local Enterprise Partnerships (for West Berkshire, the Thames Valley Berkshire LEP), whose geography properly reflects the natural economic areas of the country, which are encouraged to work in respect of transport, housing and planning as part of an integrated approach to growth and infrastructure delivery. This approach supports that of assessing requirements as part of a wider functional market area, whilst devolving more power to local communities.

1.61. The 10,500 housing requirement for West Berkshire in the South East Plan has been supported by the Council but is still seen by many locally as a centrally imposed target. Although this level of housing is undoubtedly needed to support the local economy, it would not seem appropriate to increase this requirement at a time when policies are evolving and the top-down target is not seen as the way forward. The White Paper and the subsequent proposals in the Localism Bill outline the concepts of neighbourhood plans where communities will have the freedom to bring forward more development than that set out in the local authority plan. This emerging approach brings extra flexibility to the challenge of increasing housing delivery over the plan period without any increase to the overall requirement in the Core Strategy.

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[5] Localism Bill – Bill 126 House of Commons 13 December 2010.
[6] Local growth: realising every place's potential: HM Government 28 October 2010

Sustainability Appraisal Information

1.62. The Core Strategy has been subject to a sustainability appraisal process. Both the Options for the Future and the Publication version were accompanied by a Sustainability Appraisal report which included consideration of the policy to provide for the delivery of the South East Plan housing requirement.

1.63. The sustainability appraisal carried out as part of the Options for the Future consultation considered a housing requirement for 11,000 net additional dwellings, to include the shortfall from the previous plan period, as explained earlier in Section 1.14, and examined the sustainability impact of options for less or more than this amount. An increase in the housing requirement above this level emerged as the least sustainable option; though it would assist in providing housing, considerations relating to landscape character, flooding and infrastructure requirements are all constraints on delivering higher housing numbers. The conclusion on the preferred approach for an 11,000 requirement was that there were some positive environmental, economic and social sustainability impacts, with limited negative effects that can be mitigated against through complementary policies in the Core Strategy.

1.64. At the formal consultation stage when the Core Strategy was published, the policy was amended to reflect the adopted South East Plan as the Government Office had confirmed the housing requirement. The sustainability appraisal concluded that the amendment to 10,500 additional homes was not considered to have significant effects which would warrant further SA being undertaken, particularly as this was being dealt with through adjusting the phasing for the development of the strategic site at Sandleford. Flexibility has been built into the longer term planning by allocating this site which is programmed to deliver housing in the latter half of the plan period and continue delivery beyond 2026.

Implications on Infrastructure provision

1.65. The Infrastructure Delivery Plan (IDP) sets out the key infrastructure requirements needed to support the level of growth proposed in the Core Strategy for 10,500 new homes. The infrastructure providers worked with the figure of 10,500, together with the proposed distribution for the four spatial areas and the two strategic sites. An increase in housing beyond this figure on a modest scale, to reflect the inbuilt flexibility and the potential for neighbourhood plans to propose limited additional development, would be unlikely to raise any significant issues of under provision in terms of infrastructure and could be accommodated in any work to support the Community Infrastructure Levy proposals put forward by the Council in the future, but any new large scale residential proposals would require significant transport modelling and other infrastructure appraisal to identify additional needs.

Conclusions

1.66. PPS3 identifies a number of considerations to be taken into account in determining the level of housing provision, including relevant local and national policies. This paper shows that a range of factors have been taken into account in determining the level of new housing to be delivered over the Core Strategy period. The implications of the approach have been explored as far as is possible at the local level with the evidence available.

1.67. The Council has concluded that, having regard to the prevailing economic climate and forecasts of growth in jobs, the delivery of approximately 10,500 homes would be unlikely to result in significant imbalance in the number of homes and jobs created. The evidence does show quite clearly that the patterns of commuting in Berkshire are complex and that there is significant inter-relationship between the urban centres in the housing market area.

1.68. In terms of need and demand, both the HMA and Government household projections imply a high requirement. The HMA does point out, however, that to meet the housing need it would require a substantial increase in overall provision that could not realistically be met. The HMA also indicates that there are significant challenges already to meeting the South East Plan requirement.

1.69. There are always uncertainties involved in the use of projections, both economic forecasts and demographic projections. In the case of the demographic projections the Council would question the realism of the latest projections which take forward the trend of the last few years when the economic climate was different and when local house building rates were at a peak. These latest projections contrast with earlier projections which informed both the South East Plan and the Core Strategy, when rates of in-migration were significantly less. In addition, projections are recognised as significantly less reliable at the level of the District than at the wider regional or national level. The Council does not therefore propose to increase the requirement in response to the latest household projections, which were published after Submission and since the timetabled hearings ended. The Council has therefore concluded that it will continue to use the plan, monitor and manage approach, rather than the approach of predict and provide, and will continue to be responsive and flexible in managing the supply, with allowance for contingencies built into the Strategy.

1.70. The level of new housing proposed is also considered appropriate having regard to evidence of land supply. Though the SHLAA does demonstrate that there are sites available to deliver significantly in excess of the 10,500 figure, the analysis at a site level takes no account of the cumulative impacts, whether this is on the character of the settlements, the impact on the landscape or the pressure on infrastructure. In a District with significant constraints, with 74% of the area within the AONB, large areas of floodplain, health and safety considerations in respect of the presence of the AWE establishments in the District and historic environment issues to consider, the constraints are considerable.

1.71. The level of housing proposed is in conformity with the South East Plan, which has been through consultation and examination and was subject to sustainability appraisal. This remains an adopted part of the Development Plan. Conformity with this is required to meet the legal compliance test. The Council feels it is appropriate to continue to plan for this requirement, but to build in some flexibility to respond to the changing policy environment. It is apparent that the Government's intention is that communities will be empowered to produce plans to deliver higher levels of housing if they have local support and feel it would benefit their community. The housing requirement is not intended to set a ceiling to development, but neither is it intended to impose an additional requirement before the emerging policies of the new Government have become clearer.

2. The Strategic Housing Land Availability Assessment (SHLAA) Updated to November 2010

Reason for Review

2.1. The SHLAA has been reviewed in order to be as up-to-date as possible and to take on board the concerns of the Inspector expressed at the hearings into the Core Strategy and in his post hearing note. The Inspector has stated that the SHLAA has not produced a clear list of developable sites to demonstrate that the Core Strategy is deliverable. His stance is that the Council is relying on some of the sites that are "currently not developable" including those outside existing settlement boundaries, which creates uncertainties regarding the extent to which land supply is a constraint on supply, on the deliverability of the strategy and the justification for distribution between spatial areas. His particular concerns with regard to the spatial strategy were the landscape constraints within the AONB and the potential AWE constraints in the East Kennet Valley.

Changes to the SHLAA

2.2. The main focus in the SHLAA update has been on sites within the AONB, where additional landscape work has been carried out in order to provide evidence for elimination of sites, or parts of sites, that would be likely to cause unacceptable harm to the special qualities and natural beauty of the AONB.

2.3. The changes to the SHLAA include:

- Update of the five year supply to November 2010
- Amendment of the schedules to include an assessment of all sites according to suitability, availability and achievability, rather than the more general assessment included in the previous schedules for sites outside current settlement boundaries.
- Sites both within and outside settlement boundaries classified as either deliverable, potentially developable or not developable.
- Some commentary on the cumulative constraints for particular settlements, with reference to additional landscape work in the AONB and AWE impact in East Kennet Valley.

2.4. The SHLAA continues to show that there are sufficient sites within all spatial areas to demonstrate flexibility in choices for allocation.

Publication

2.5. The SHLAA, with the supporting additional landscape evidence, will be published for consultation with the Core Strategy changes on 4 February 2011. The document and the webpage will make clear that the sites are not allocated for development and that decisions regarding which sites will be allocated will be made through the development plan process, following full public consultation. The estimates of housing potential are not based on detailed design and should not prejudice any decision that may be made on the site at a later date.

3. AONB

Meeting the Identified Housing Needs of the North Wessex Downs Area of Outstanding Natural Beauty in West Berkshire

3.1. The Inspector was concerned that there had been no 'explicit consideration' by the Council of what the national advice in PPS7 of meeting 'identified local needs' means. This section of the topic paper explains the Council's approach to the proposed housing allocation set out in the Core Strategy in this part of the district, supported by evidence and set in the context of the wider policy background.

Policy Background

National Policy

3.2. The North Wessex Downs was designated as an Area of Outstanding Natural Beauty in 1972 under the National Parks and Access to Countryside Act 1949. The primary purpose of the AONB designation is –

"*conserving and enhancing the natural beauty of the area*". (Countryside and Rights of Way (CRoW) Act 2000 section 82)

'*In pursing the primary purpose of designation, account should be taken of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of economic and social development that in themselves conserve and enhance the environment. Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses'*.

3.3. Under Section 85 of the CRoW Act 2000, it is also a legal duty for all relevant authorities to "have regard to" the purpose of conserving and enhancing the natural beauty of the AONB in exercising or performing any functions affecting land in the area. These relevant authorities include all statutory bodies and all tiers of government, including parish councils and holders of public office.

3.4. Planning Policy Statement 7 (PPS7) Sustainable Development in Rural Areas sets out the Government's planning policies for rural areas, including AONBs. It states:

"Para 21. Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas……. As well as reflecting these priorities, planning policies in LDDs and where appropriate, RSS, should also support suitably located and designed development necessary to facilitate the economic and social well being of

these designated areas and their communities, including the provision of adequate housing to meet ***identified local needs."*** **(Council's emphasis).**

Regional Policy

3.5. Policy C3 of the South East Plan sets out that proposals for development should be considered in the context of the purpose of designation of the AONB, and that the development must be accommodated within the landscape features and special qualities of the AONB and be suitably located and designed. The policy states that "…..proposals which support economic and social well-being of the AONBs and their communities, **including** (Council's emphasis) affordable schemes will be encouraged provided they do not conflict with the aim of conserving and enhancing natural beauty."

3.6. The supporting text of the policy clarifies the important role that the AONBs in the South East region play, not just in contributing to distinctiveness, but to supporting and sustaining the region's high quality of life and economic success.

North Wessex Downs AONB Management Plan

3.7. For the Council, active support for the implementation of the North Wessex Downs AONB (NWDAONB) Management Plan (October 2009) is the key to satisfying its "Section 85" duty. The Management Plan provides a policy and action framework to influence and help determine planning decision making. In particular the Management Plan provides an underpinning for the development of AONB specific policy in LDFs.

3.8. The NWDAONB Management Plan notes on page 61 : "*Attractive villages nestle in the river valleys of the Pang, Bourne, Kennet and Lambourn and cluster in the low lying land to the east of the AONB.* ***Appropriate economic regeneration and development are essential to support sustainable communities*** (Council's emphasis)*. High environmental quality is recognised as making strong direct and indirect contributions to the wider regional economy.*

There is a need to manage development pressures with sensitivity both within the AONB and in the adjacent area where development could impact on the setting of the AONB in order to maintain a balance in promoting economic and social viability whilst retaining the character of the North Wessex Downs.

Communities need to be economically viable and have adequate housing, amenities and facilities. However, the primary purpose of designation of the AONB needs to be paramount when considering such issues."

3.9. The Management Plan also seeks to make the AONB a place with 'vibrant and balanced rural communities with villages and market towns meeting the needs of local people and visitors……". The Management Plan also sets out a desire for sustainable communities (page 34).

3.10. Objective 12 of the NWDAONB Management Plan seeks to "*encourage appropriate development that meets the economic and housing needs of the AONB and surrounding communities*". Objective 14 is "*to promote a sustainable rural economy*".

3.11. Other background is set out within the Matthew Taylor Review: “A Living, Working Countryside’ which is a useful analysis of the role of the planning system in promoting and delivering sustainable rural communities. The review sets out the implications of an overly restrictive approach to development, with resultant increasingly unsustainable communities. Sensitive and appropriate development is necessary which balances the social, economic and environmental factors to promote sustainable communities.

Local Policy

3.12. The West Berkshire Core Strategy proposals for the area reflect one of the Councils’ key outcomes from the Council Plan. This is therefore of corporate importance to West Berkshire Council. This outcome “Vibrant Villages” sets out the importance of retaining successful and vibrant villages as key to improving the quality of life within rural communities and its key objectives of

- Supporting the economic and social fabric of our market towns and villages, and
- Enabling sufficient housing to accommodate continued economic prosperity and increasing the provision of affordable housing

3.13. This priority is also reflected in the Sustainable Community Strategy objective on housing needs which seeks “*the provision of affordable and market housing to help meet local needs in both urban and rural areas of the District. To provide homes in a way that promotes sustainable communities, providing a mix of house sizes, types and tenures to meet identified local needs and respond to the changing demographic profile of the District*.”

What is the identified local need for housing in the AONB part of West Berkshire?

3.14. There are two types of local needs relating to housing – open market housing and affordable housing.

3.15. This reflects national guidance contained in PPS 3 (para 38) which notes “*the need to provide housing in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability; and the need to develop mixed sustainable communities across the wider local authority area*”.

3.16. In addition, paragraph 21 of PPS 7 which states local planning policies in designated areas should “*support suitably located and designed developments necessary to **facilitate** the economic and social well-being of the designated area and its communities, **including** the provision of adequate housing to meet identified local needs*” (Council emphasis).

3.17. The Council currently has just over 4,500 residents registered on its Common Housing Register with just over 80% expressing a need for either a one or two bed property. The need for affordable housing throughout the District has also been assessed as part of the Berkshire Housing Market Assessment (HMA) which demonstrated a very high level of need, well above what could realistically be developed.

3.18. Under the Councils' "Home Choice" scheme households have the opportunity to make multiple expressions of interest in housing across the District and the Council currently has 7,800 choice preferences for housing within the NWDAONB part of West Berkshire. 80% of this expression of interest is in the one and two bed properties. This information is set out in Appendix A.

3.19. Of the households on the Council's Common Housing Register, 1,192 have indicated that they have a local connection. Of this total, 560 households have indicated their local connection to a parish within the AONB. Hungerford, Lambourn, Pangbourne and Kintbury all have over 40 households on this waiting list with a local connection to the parish.

3.20. Completed parish level housing needs surveys will help to inform the specific levels of provision made in each service village through the Site Allocations and Delivery DPD.

3.21. Local housing needs surveys have already been undertaken for Hungerford, Lambourn, Pangbourne, Chieveley, Kintbury, Compton Great Shefford and Bradfield Southend the results of which are shown below.

Table 6: Local Housing Needs Surveys in the AONB

Settlement	Identified Need	Response Rate	Date of Completion
Hungerford	65 units	28.7%	February 2007
Lambourn	27 units	17%	November 2008
Pangbourne	21 units	18%	June 2009
Bradfield Southend	7 units	23%	April 2008
Chieveley	21 units	25.5%	April 2006
Compton	8 units	16%	July 2009
Great Shefford	2 units	14%	July 2009
Hermitage	No survey undertaken		N/A
Kintbury	10 units	22%	December 2009
Total Requirement	121 Units		

3.22. It should be noted that the identified need referred to above relates to identified need of "affordable housing" only and also only relates to that specific need at the time of the survey.

3.23. There is clearly a high demand for affordable housing within the North Wessex Downs AONB, which, in a similar way to the rest of the District, it will not be possible to meet in full. However, opportunities must be made to respond to this high level of need, including a proactive approach to rural exceptions sites in accordance with policy CS8 of the submitted Core Strategy.

3.24. Affordable housing is, however, only part of the housing need within the AONB. There are a number of factors which point towards a high requirement for private housing. These include high house prices and other evidence including information from the 'barriers to housing and services' score from the Indices of Deprivation 2004. The indicator measures the following:

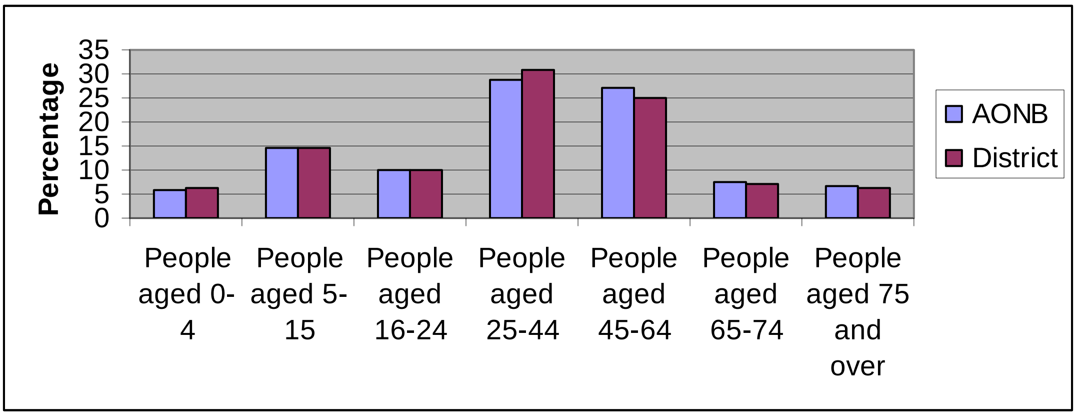
- housing overcrowding
- % of households for whom a decision has been made on their application for assistance under the homeless provisions of housing legislation
- difficulty of access to owner occupation such as affordability
- road distance to GP premises, primary school, supermarket/convenience store and post office.

3.25. Of the 140 'local super output areas' in the North Wessex Downs as a whole (not West Berkshire specific), 64 (45.7%) are in the bottom 20% of most deprived local super output areas in the South East and South West for barriers to housing and services. These include much of the Lambourn Valley and Downs area.

3.26. Additionally the West Berkshire Place Survey which was carried out in 2008/9 identified 'access to affordable decent housing' for people in rural communities in West Berkshire as a key issue.

3.27. The population of the AONB represents some 29% of the total population of the District, and the growth of this population is a further indicator of the level of local need for housing. Figure 3 shows the age structure at 2001 of the population in the parishes largely within the AONB compared to that of the District as a whole. It is broadly similar, with a slightly lower proportion of younger adults and young children and slightly higher proportion of those over 45. In terms of the pattern of projected natural growth it is unlikely to differ markedly from the district as a whole.

Figure 3



Past Housing Delivery in the AONB

3.28. Past housing delivery in the AONB over the period 2001 – 2010 has averaged approximately 140 net new dwellings per annum. This figure includes some housing sites allocated in the West Berkshire District Local Plan. In the period 2001 to 2006 Local Plan housing sites were completed in Chieveley for 50 units and in Hungerford for 84. Since 2006 Hermitage has seen considerable growth with 209 dwellings completed on the former Cementation site and the Local Plan site at Bucklebury has been developed to provide 40 homes.

Housing Growth

3.29. The housing allocation of 2,000 dwellings within the AONB over the Core Strategy period 2006 – 2026 is equivalent to an average annual growth of 100 net dwellings per annum. When the dwellings already completed are taken into account the figure represent an average annual addition of 81 new homes across the AONB in West Berkshire over the period 2010 to 2026.

3.30. The growth proposed in the AONB is equivalent to 19% of the total growth over the whole plan period and 16% of the growth planned across the District for the period 2010 to 2026. The policy to focus development in the more sustainable settlements, particularly the urban areas of the District, coupled with compliance with the Council's duty to have regard to the purposes of designation of the AONB has influenced the housing distribution. The evidence of housing need from the HMA and the housing waiting list demonstrates that additional housing is needed throughout the District, including the AONB; the issues in the rural areas are exacerbated by the limited supply and high cost of housing. The SHLAA has demonstrated that there are potential housing sites within and adjacent to the more sustainable rural service centres and service villages in the AONB which could be developed without unacceptable harm to the special qualities and natural beauty of the AONB and which could provide much needed housing to meet local need and demand and support the rural economy.

Strategic Housing Land Availability Assessment taking into account the importance of the AONB landscape

3.31. The SHLAA has identified a large number of potential sites within the AONB that have been submitted for consideration by landowners and developers. In the AONB, the conservation of the natural beauty of the landscape will be the paramount consideration in assessing these sites, in accordance with the Council's statutory duty of regard to the purpose of designation of the AONB.

3.32. Further detailed work has been undertaken on the landscape sensitivity of the sites being promoted for development through the SHLAA. The work has summarised the key characteristics of each rural service centre and service village within the AONB and the landscape constraints on the extent and location of development, and assesses the impact of each site.

3.33. Though the SHLAA has classified a number of sites as not developable on grounds of landscape impact, those remaining as potentially developable need to be seen as alternatives – in some settlements the potential cumulative impact of development would be considerable. The SHLAA has indicated where there are particular issues and choices to be made.

Conclusion

3.34. The policy background for the AONB sets out a priority of protecting and enhancing the quality of the designated landscape. However, it also emphasises the need to meet identified local needs for housing and facilitate the continued social and economic well being of the North Wessex Downs AONB.

3.35. None of the policy background restricts development within the AONB to purely affordable housing and the Council considers that this approach would be inappropriate, and would not address wider housing need, or contribute to sustainable communities. As well as being of national landscape importance, the North Wessex Downs is an area where people live and work and this has been taken into account through the Council's preparation of the Core Strategy. Whilst the Core Strategy as a whole has an urban focus, it is important that rural communities, particularly those identified in the settlement hierarchy as Rural Service Centres or Service villages, are given the right development opportunities to enable them to continue to fulfil their role and function for the surrounding area.

3.36. In the AONB the Councils' primary aim is to conserve and enhance the natural beauty and landscape quality, whilst at the same time having regard to the economic and social well-being of the area. In terms of the District's Settlement Hierarchy, the rural service centres of Hungerford, Lambourn and Pangbourne all lie within the boundaries of the AONB, as do the service villages of Compton, Hermitage, Bradfield Southend, Kintbury, Great Shefford and Chieveley. Implementation of the West Berkshire Core Strategy approach of strengthening these communities and enhancing their role in line with national guidance will result in additional development to 2026, dependent on the role and function that the settlement performs, supported by suitable development opportunities, identified through the SHLAA. This is a justified and proportionate approach in the context of the wider Core Strategy objectives to build stronger sustainable communities and meet the social and in particular the housing and economic needs of the area.

3.37. The outcomes of the landscape sensitivity work have confirmed that the development proposed within the spatial strategy of the Core Strategy for the North Wessex Downs can be accommodated without having a detrimental impact on the national landscape, and the outcomes of this will be used to help identify suitable development opportunities through the Site Allocations and Delivery DPD.

4. Clarification of the presentation of housing distribution

4.1. The presentation of the housing figures within the Core Strategy has been simplified to respond to the Inspector's concerns about this element of the document. Within the submitted Core Strategy, housing figures were set out both for the spatial areas, and for the different levels of the settlement hierarchy. This reflected the evolution of the Core Strategy, with the spatial strategy initially developed based around the different tiers of the settlement hierarchy, with figures set out for the urban areas; the rural service centres and the service villages. Following the consultation on the Options for the Future, the spatial strategy took a broader place-shaping approach in order to better reflect the distinctive characteristics of different parts of West Berkshire. This resulted in the District being divided into four spatial areas with policy frameworks developed for each of these areas, and housing figures set out for these spatial areas.

4.2. The Inspector asked that the housing figures be presented in a consistent manner, building on the spatial approach set out in the Area Delivery Plan policies. This has led to the Core Strategy being amended with one set of housing figures set out in the Area Delivery Plan Policies, setting out the scale of development for each of the four spatial areas, and removing the figures from the different levels of the settlement hierarchy in Policy SP1 (Spatial Strategy). New explanatory text to Policy SP1 explains the role of the different parts of the settlement hierarchy in terms of the functions that they perform for the surrounding area. The presentation has been simplified by transferring some of the policy content from Policy CS2 (Spatial Distribution) into CS1 (Delivering New Homes and Retaining the Housing Stock) and the deletion of Policy CS2.

4.3. The Inspector also felt that it was confusing to have Pangbourne in two overlapping spatial areas. Within the submitted Core Strategy, Pangbourne was within both the Eastern Area and the North Wessex Downs AONB. This was intended to reflect the functional relationship of Pangbourne with the Eastern Area. As Pangbourne is factually in the North Wessex Downs AONB, references to it have been moved from the Eastern Area to the spatial policy on the North Wessex Downs AONB. Adjustments have been made to the housing numbers to reflect this move, and the hatching, indicating the Eastern Area broad location for development has been removed from figure 5.

4.4. The Inspector also wanted further information about the appropriate scale of development to be set out for the Rural Service Centres and Service Villages within the AONB, with the scale of development that might be appropriate for Hungerford contrasted, for example, with the scale of development for Lambourn and for Pangbourne. This has been progressed through adding more detail to the wording of the Area Delivery Plan policies to draw out in more detail local distinctiveness and the issues affecting the appropriate housing distribution for each Rural Service Centre and Service Village. This has included reference to the opportunity sites at Compton Institute of Animal Health and Dennison Barracks at Hermitage.

4.5. The Area Delivery Plan policies also reflect the current availability of SHLAA sites and other factors, including, for example, the constraint caused by the AWE sites to any future development within the Service Village at

Aldermaston. There will also be further information provided through the evidence base about the availability of SHLAA sites in each area.

5. Business Development

5.1 This section of the topic paper focuses on the B1 element of the employment land stock and assesses whether the forecasted shortfall of B1 floorspace can be accommodated on existing sites and premises.

Background – Employment Land Assessment

5.2 The West Berkshire Employment Land Assessment (ELA, 2007) (CD09/21) was conducted as part of the evidence base for the Local Development Framework (LDF), and was published in May 2007. The study assesses the demand for and supply of employment land over the plan period to 2026, ensuring the appropriate provision of land for business development. The ELA follows the advice contained within the 2004 Employment Land Reviews Guidance Note (ODPM) (CD04/09).

5.3 The ELA takes a long term approach to business development, examining the supply and demand in order to draw conclusions on how the existing portfolio of employment land stock meets, or falls short of, future requirements. It is considered that this study, given its long term approach, still provides useful and relevant information to inform policy development over the Core Strategy plan period to 2026.

5.4 The key conclusion to be drawn from the ELA is that the District has 'a sufficient quantity of supply to meet demand in overall terms and thus no need to plan for a net increase in employment land stock' (ELA, 2007, CD09/21). This, therefore, is the approach taken forward in the Core Strategy, which sets out a strategic framework to retain the existing quantity of employment stock through policy CS10.

5.5 Whilst the ELA concludes that no net additional employment land stock needs to be planned for, there is a mismatch in the supply and demand amongst the different use classes. The study highlights that over the plan period there is insufficient supply of B1 space to meet the likely future requirements (121,000sqm shortfall); a forecasted decline in demand for B2 space means there is an excess of supply in B2 (65,000sqm surplus); and in terms of B8 there is sufficient quantity of supply to meet demand in the short-term but in the longer term there is the potential for a small shortfall (24,000sqm shortfall). The shortfall in office floorspace is made up if B1a, B1b and B1c. The ELA does not distinguish the proportion of shortfall under each use class. This imbalance will be proactively addressed through a comprehensive review of the Protected Employment Area (PEA) boundaries within the Site Allocations and Delivery DPD, along with detailed Development Management policies. The review of the PEAs will provide the scope and flexibility to reconfigure the existing employment land stock to address the outcomes of the ELA and provide for business needs in the future.

Planning Policy Statement (PPS) 4

5.6 Updated national guidance, PPS4 (CD03/04), was published in December 2009. The policy document sets out a series of policies aimed at guiding economic development, both regionally and locally, to deliver sustainable economic growth. PPS4 encompasses not only B use classes but also main town centre uses as well as public and community uses.

5.7 PPS4 sets out that offices, B1a, are a main town centre use and should be located within town centres to maintain the diversity of uses and ensure the vitality and viability of centres. Any proposal for such a use outside of the town centre must demonstrate that a sequential approach to site selection has been undertaken as set out in policy EC5. According to national guidance the sequential approach is intended to achieve two policy objectives; firstly, the assumption that town centre sites are most readily accessible by alternative means of transport and therefore reducing the need to travel; and secondly, by accommodating such uses within town centres customers have the ability to make linked trips, reinforcing the vitality and viability of the existing centre.

5.8 Adopting a sequential approach to site selection means wherever possible seeking to direct new development to sites within town centres, or failing that directing them to well located sites on the edge of an existing defined centre. Only if town centre or edge of centre sites are not available will out of centre locations be likely to be appropriate, provided they are well served by alternative means of transport and are acceptable in all other aspects including impact. Some of the District's offices are already located on sites which are classified as out of centre, such as Newbury Business Park and these locations play an important role in the District's economy.

5.9 PPS4 outlines the following set out definitions to assist in the sequential approach.

<u>Town centre:</u> Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined on the proposals map.
<u>Edge of centre:</u> For office development, locations outside the town centre boundary but within 500 metres of a public transport interchange including railway and bus stations, within the urban area should be considered as edge of centre locations for the purposes of the sequential approach.
<u>Out of centre:</u> A location which is not in or on the edge of a centre but not necessarily outside the urban area.
<u>Out of town:</u> An out of centre development outside the existing urban area.

West Berkshire Context

5.10 During the Examination hearing sessions (November 2010) the Inspector highlighted the need to ensure that the approach taken to office development was consistent with that set out in PPS4 and to show that the shortfall of B1 floorspace could be accommodated on existing sites through the sequential approach outlined above.

5.11 The ELA concludes that over the plan period there will be a shortfall in B1 floorspace of approximately 121,000sqm. This shortfall includes B1a Offices, B1b Research and Development and B1c Light Industry. The ELA also concludes that this shortfall can be accommodated through the efficient utilisation of existing sites across the District, and that there is not a need to allocate any additional employment land.

5.12 The Council, through policy CS10, will seek to effectively utilise existing sites and premises for business development and to direct office developments to town and district centres in the first instance, in accordance with PPS4. However, not all office development will take place within the District's centres, given their size and character and the nature of the existing employment distribution. Policy CS12 sets out the District's hierarchy of centres based on their scale, character and function. Newbury is outlined as a major town centre, and is the only centre within the District which is best suited to larger office development, given the nature and size of development already within the centre. The other town and district centres of Thatcham, Hungerford, Pangbourne, Lambourn and Theale, given their size and character, would only be able to accommodate small office development, more limited and in keeping with their character. It is important therefore, that in addressing the shortfall of B1 floorspace across the District flexibility is applied to its location.

5.13 Protected Employment Areas (PEAs), as designated under the West Berkshire District Local Plan Saved Policies (CD06/01), are specified business areas across the District where B class uses are clustered. Some of these PEAs are well located in terms of accessibility and already host a large amount of office development within them, for example Arlington Business Park, Theale. Others, given the rural nature of West Berkshire, are more remote and less sustainable but nonetheless provide a vital contribution to the local economy. Pending the comprehensive review to take place through the Site Allocations and Delivery DPD, the Council considers it necessary to sustain and where appropriate enhance what is already within these locations, ensuring the scale and nature of the development is consistent with the location and function of the PEA.

5.14 In terms of meeting the potential shortfall of B1 as set out in the ELA, policy CS10 will utilise the sequential approach to office development. It is imperative that all office development seeks to locate within the town centre in the first instance and following this if no suitable sites are available then an edge of centre location can be sought, preferably within a PEA. However, it should be noted that as the shortfall is not made up entirely of B1a floorspace, the whole 121,000sqm outlined within the ELA would not be subject to a sequential approach. The ELA does not distinguish the proportion of shortfall under each use class.

5.15 The table below sets out the relationship between the town and district centres and West Berkshire's PEAs in terms of the PPS4 sequential approach for site selection for main town centre uses. This demonstrates how the sequential approach will be applied.

Table 7 - Status of Protected Employment Areas in relation to the sequential approach to site selection.

	Centre	Edge of centre	Out of centre	Out of town
Major Town Centre	**Newbury**	- London Road Estates - Hambridge Road/Lane - Newbury Business Park*	- Turnpike Road Estate - Castle Estate	
Town Centre	**Thatcham**	- Green Lane	- Colthrop Estate	
	Hungerford	- Charnham Park - Station Yard	- Smitham Bridge/Hungerford Trading Estate	
District Centre	**Pangbourne**		- Horseshoe Park	
	Lambourn			-Membury Estate - Lowesdon Works
	Theale	- Arlington Business Park - Station Road and adjacent Estates		- Theale Lakes at Sheffield Bottom
Smaller settlements	**Aldermaston**		- Calleva Park	- Paices Hill/Youngs Industrial Estate
	Hermitage			- Red Shute Hill
	Beenham			- Beenham Industrial Area

* See paragraph 5.33 for explanation.

Updating B1 Employment Land Supply

5.16 In establishing if this shortfall of B1 floorspace can be met through existing sites and premises it has been necessary to update the B1 employment land supply figures from 2006, as set out within the ELA, to 2010. This will provide a more up to date picture of current circumstances and determine whether the shortfall of 121,000sqm still exists. The ELA was completed in 2007 and used base-date information from 2006, which means that since the study was conducted four years of development activity has taken place across the District.

5.17 The ELA calculated the available supply of employment land within Section 2 of the study by assessing the available commercial floorspace, unimplemented commitments and supply at New Greenham Park. This supply at New Greenham Park is essentially unimplemented planning commitments and in order to update the figures this element will be taken into account as part of the current unimplemented planning commitments.

5.18 Taking each element of the land supply in turn, starting with the available commercial floorspace, a comprehensive list of West Berkshire's available commercial premises has been compiled using the commercial property market database from Focus CoStar. This is the same source used within the ELA in 2006. The table below sets out the District's total available floorspace as at January 2011, and depicts a total of 262,448sqm of available commercial floorspace across the District with just over 50% of this space being B2/B8 and just under 50% as B1 (43%).

Table 8 - Available Commercial Floorspace

	Available Commercial Floorspace (sqm)	%
Office (B1)	113,970	43%
Industrial/Warehouse (B2/B8)	148,478	57%
Total	**262,448**	

Source: Focus CoStar, 2011

5.19 To ensure the supply of available B1 floorspace facilitates market churn and does not result in an over estimate the ELA assesses available floorspace against the total stock in use and applies a 10% discount to allow for market churn. In 2006 West Berkshire had a total stock of B1 floorspace of 473,664 sqm. Since this time there have been 38,685sqm of net completions (internal floorspace), which if added to the stock in 2006 gives a total stock of B1 floorspace in 2010 of 512,349sqm. The table below sets out the available commercial floorspace with the discount applied.

Table 9 - Available Commercial Floorspace accounting for market churn

	Total stock in use (sqm)	Available commercial floorspace (sqm)	Total stock (sqm)	10% of total stock (to be discounted) (sqm)	Available commercial floorspace with discount applied (sqm)
B1	398,379	113,970	512,349	51,235	62,735

Source – DTZ, Focus

5.20 Taking into account for market churn the available B1 floorspace within West Berkshire is 62,735sqm.

5.21 Unimplemented planning commitments are the second key element of employment land supply. These are sites with planning permission that have not yet been implemented. The ELA used planning commitments as at 31st March 2006, and in order to update these figures the table below sets out the number of unimplemented planning commitments as at 31st March 2010. These figures are net internal floorspace.

Table 10 - Unimplemented Planning Commitments as at March 2010.

March 2010	B1	B2	B8	B1-B8	Total
Net floorspace (Internal floorspace sqm)	193,845	52,340	32,861	14,924	293,970

Source: West Berkshire Planning Commitments for Employment, JSPU, 2010

5.22 To calculate the total supply of B1 floorspace in 2010, the available commercial floorspace must be added to unimplemented planning commitments for B1 uses, giving a total supply figure of 256,580sqm. When this figure is compared against that of 2006 it is evident that the supply of B1 floorspace has increased by approximately 96,023sqm. This has the knock-on effect of reducing the forecasted shortfall of B1 floorspace from 121,000sqm to 25,420sqm.

Meeting the requirements for B1 floorspace:

5.23 Whilst the current supply of B1 space is making a significant contribution to meeting the forecasted future requirements, there remains a shortfall in quantitative terms up to 2026. According to the maximum levels of demand forecasted within the ELA and the updated supply figures above, this shortfall equates to 25,420sqm.

5.24 This shortfall could be met through the redevelopment, and possible intensification, of existing sites and premises that are currently in use classes where there is excess supply and lower forecasted demand over the plan period. The total available commercial floorspace figures set out above (in Table 8) illustrate that 148,478sqm of available B2/B8 floorspace exists across West Berkshire, which is more than enough to meet the forecasted shortfall of B1, and the potential shortfall in B8 set out in the ELA.

5.25 B1a office developments are a town centre use and therefore the sequential approach would need to be applied to any proposal for new office developments outside of an existing centre. Appendix C therefore sets out the available B2/B8 floorspace in relation to this sequential approach.

5.26 Appendix C shows that within existing centres there is no available B2/B8 floorspace, but this is to be expected since such uses would not normally be acceptable in town centre locations. There is however, a strong supply of available B1 floorspace within the District’s existing centres as set out in Appendix B. This supply is predominantly made up of existing premises rather than large scale redevelopment opportunities, and therefore it is imperative that the Council retain and encourage the take-up or upgrade of existing available space, whilst monitoring the unimplemented planning commitments to ensure a sufficient supply of B1a floorspace is maintained within town centre locations.

5.27 Following the sequential approach, if no suitable available sites exist within town centre locations, edge of centre sites can be examined for their suitability. Appendix C sets out that within edge of centre locations 33,105sqm of B2/B8 floorspace is currently available. All of this available floorspace can be found within Protected Employment Areas categorised as edge of centre within Table 7 above and is therefore sequentially preferable to out of centre locations. This available supply would, in quantitative terms, be sufficient to meet the forecasted shortfall of B1 space over the plan period. It should also be noted that B1a space is often developed at higher densities than B2/B8 space and therefore it is possible that these available B2/B8 sites could be redeveloped to provide more business than currently exists.

5.28 Out of centre and out of town locations host the rest of the available B2/B8 floorspace (115,373sqm), much of which is accommodated within either Protected Employment Areas or existing business areas/parks, such as New Greenham Park, Benham Valance or Easter Park. Whilst these out of centre and out of town locations are less accessible, they are often well established employment areas with appropriate infrastructure in place and existing compatible and/or supporting uses within close proximity. Most of these areas contain of some of the District's existing B1 stock and it is considered appropriate to sustain and where necessary enhance what is already within these locations, provided the appropriate sequential approach has been carried out. These locations, through positive and proactive management of existing sites, could also assist in meeting any future requirements for B8, whilst managing the demand in B2.

Additional factors to be considered when addressing the shortfall of B1 space

5.29 In determining whether the forecasted demand of B1 floorspace can be accommodated on existing sites and premises the factors set out below should be considered.

Flood Risk

5.30 The Inspectors Post Hearing Note 2, highlights the need to apply the sequential flood risk assessment to any sequentially preferable locations for B1a use that are at high risk of flooding, in accordance with national policy. Appendix D of PPS25 (CD03/12) states that B1a offices are a less vulnerable use and therefore in terms of location such uses are appropriate within Flood Zones 1, 2 and 3a with the possible need for some flood mitigation measures depending on individual site circumstances and in compliance with policy CS17 of the Core Strategy. Within Flood Zone 3b B1a office developments should not be permitted unless they are located on the same footprint of the existing built form, in accordance the West Berkshire Strategic Flood Risk Assessment (WBSFRA) (Cd09/22 & 09/23).

5.31 The paper sets out that as there is no available floorspace for B1a uses within existing centres, except for that already factored into the supply, the most sequentially preferable locations to meet the demand for B1a floorspace are those edge of centre sites within Protected Employment Areas which host available B2/B8 floorspace. In accordance with the EA Flood Zone Maps and the WBSFRA these identified sequentially preferable locations are for the most part not considered to be at high risk of flooding as they lie within either Zones 1, 2 or 3a. Only a very small part of Arlington Business Park and very small pocket of the London Road Industrial Estates lie within Flood Zone 3b, however it is not considered to be significant enough to pose a problem to the employment land supply at this strategic level.

Redevelopment of London Road Industrial Estates

5.32 The Newbury Vision 2025 (Cd10/01) sets out the desire to redevelop the Faraday Road area of Newbury. This is supported within Area Delivery Plan Policy 2 of the Core Strategy and a feasibility study is already underway by the Council to assess the potential for redevelopment of the London Road Industrial Estates. Within this redevelopment there is potential to enhance the employment base of these sites to create some high quality B1a floorspace. At this stage the quantity of any potential B1a floorspace could not be quantified but this provides contingency within the Core Strategy plan period to utilise a key edge of centre site within a Protected Employment Area to assist in meeting requirements for B1.

Newbury Business Park

5.33 Newbury Business Park is a Protected Employment Area containing high quality B1a floorspace close to Newbury town centre. As this site does not fall specifically within the definition of edge of centre in accordance with PPS4, it is categorised as out of centre and therefore would be considered second to those sequentially preferable sites on the edge of Newbury town centre. However, the Council feel that given the characteristics of Newbury Business Park and the supply of B1a floorspace that currently exists, the sequential approach to B1a development could undermine the Business Park's role, function and vitality. It is considered appropriate therefore to make an exception to the edge of centre category and make Newbury Business Park sequentially preferable in the same manner as sites on the edge of Newbury town centre, such as Hambridge Road. It is intended that this approach is set out in policy CS10 of the Core Strategy.

Strategy going forward – Core Strategy/SAD DPD

5.34 This paper demonstrates that the forecasted requirements of B1 floorspace over the plan period can be accommodated on existing sites in sequentially preferable locations, in quantitative terms. It highlights that the shortfall of B1 space has decreased from approximately 121,000sqm in 2006 to approximately 25,500sqm in 2011. This is due to a large amount of unimplemented planning commitments and more available commercial floorspace, both of which could be attributed to the downturn in the current economic climate. Nevertheless there is still sufficient available B2/B8 floorspace to accommodate the forecasted business requirements over the plan period.

5.35 In assessing the capacity of existing sites a sequential approach was taken to accommodating the shortfall in B1 floorspace, looking at available floorspace within existing centres first, and then looking outwards at edge of centre and out of centre locations. The shortfall of B1 comprises of B1a, B1b and B1c but only B1a development is subject to the sequential approach under PPS4. However, as the ELA does not distinguish the proportion of the shortfall under each use class, capacity for the whole of the shortfall (25,420sqm) was examined through the sequential approach.

5.36 To address the conclusions of this paper policy CS10 has been updated to reflect in more detail the sequential approach to be taken to office development in accordance with national policy.

5.37 Given that a shortfall of B1 floorspace continues to exist it is pertinent to retain the quantity of existing employment land until a comprehensive review of the District's Protected Employment Areas is conducted through the Site Allocations and Delivery DPD. At this stage, the role, function and boundaries of these areas will be assessed to achieve a balanced portfolio of fit for purpose sites to meet future requirements. This review will provide the scope and flexibility to reinforce the existing employment land stock and if necessary reconfigure the Protected Employment Areas.

5.38 As economic circumstances are constantly changing it is important to continuously and effectively monitor the supply of employment land across the District, along with the possible need to review the projected floorspace requirements and assumptions set out within the ELA when appropriate throughout the plan period.

6. Other Changes

6.1 The Inspector highlighted a number of other changes to the Core Strategy which he recommended the Council should consider. These have been included in the Schedule of Post Examination Proposed Focused Changes.

Appendix A:

Choices by Parish in the AONB as at 25/11/10

	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Hungerford	303	194	57	25	6	585
Pangbourne	264	187	102	24	7	584
Cold Ash	232	171	58	18	7	486
Yattendon	208	133	45	11	6	403
Purley	140	141	69	20	4	374
Hermitage	155	130	49	11	4	349
Bucklebury	159	109	51	10	5	334
Bradfield	155	94	59	12	3	323
Kintbury	161	109	40	7	2	319
Chieveley	162	101	34	13	6	316
Compton	94	78	40	11	0	223
Sulham and Tidmarsh	89	67	40	10	2	208
Englefield	90	64	39	8	1	202
Beenham	84	62	40	9	5	200
Lambourn	104	57	25	11	1	198
Inkpen	78	47	59	8	1	193
Hampstead Norreys	90	62	29	7	2	190
Basildon	65	55	24	8	2	154
Hamstead Marshall	80	50	19	4	1	154
Great Shefford	77	51	19	3	3	153
Boxford	78	47	14	6	2	147
Ashampstead	65	44	27	7	0	143
Chaddleworth	61	42	26	3	2	134
Streatley	65	37	14	5	0	121
East Ilsley	61	34	15	5	1	116
Beedon	54	35	12	9	2	112
Winterbourne	49	29	14	1	3	96
West Woodhay	51	29	9	1	1	91
East Garston	45	33	9	2	1	90
Frilsham	43	26	15	2	1	87
Stanford Dingley	48	25	10	1	1	85
West Ilsley	46	26	8	4	1	85
Brightwalton	36	29	15	3	1	84
Aldworth	44	23	12	4	0	83
Welford	40	29	9	2	2	82
Leckhampstead	34	31	9	2	1	77
Farnborough	32	24	8	8	1	73
Peasemore	31	21	11	2	2	67
Combe	31	19	7	3	0	60
Fawley	22	15	3	1	0	41
Catmore	19	10	4	2	1	36
	3745	**2570**	**1149**	**303**	**91**	**7858**

APPENDIX B:

Available Commercial Floorspace in West Berkshire

The table below illustrates the total available commercial floorspace for B1, B2 and B8 uses within West Berkshire in sequentially preferable locations.

Location	Available commercial floorspace (sqm) (B1-B8)
Town/District Centre	
Newbury town centre	17,067
Thatcham town centre	169
Hungerford town centre	60
Pangbourne town centre	831
Theale town centre	124
Town/District centre total	**18,251**
Edge of centre (EOC)	
EOC Protected Employment Area	60,145
EOC Newbury	45
EOC Thatcham	761
EOC Hungerford	2,288
EOC Pangbourne	154
EOC Theale	0
EOC Rest of West Berkshire	117
EOC Total	**63,510**
Out of centre (OOC)	
OOC Protected Employment Area	76,693
OOC Newbury	718
OOC Thatcham	1,273
OOC Hungerford	0
OOC Pangbourne	156
OOC Theale	0
OOC Rest of West Berkshire	1,537
OOC Total	**80,377**
Out of town (OOT)	
OOT Protected Employment Area	11,640
OOT New Greenham Park	55,136
OOT Other Business Parks (Easter Park/Benham Valance)	7,692
OOT Rest of West Berkshire	25,842
OOT Total	**100,310**
Total West Berkshire Available Commercial Floorspace	**262,448**

Source: Focus CoStar, Jan 2011

APPENDIX C:

Available Commercial Floorspace in West Berkshire for B2/B8 uses only

The table below illustrates the total available B2 and B8 floorspace within West Berkshire in sequentially preferable locations.

Location	Available commercial floorspace (sqm) (B2/B8)
Town/District Centre	
Newbury town centre	0
Thatcham town centre	0
Hungerford town centre	0
Pangbourne town centre	0
Theale town centre	0
Town/District centre total	**0**
Edge of centre (EOC)	
EOC Protected Employment Area	33,105
EOC Newbury	0
EOC Thatcham	0
EOC Hungerford	0
EOC Pangbourne	0
EOC Theale	0
EOC Rest of West Berkshire	0
EOC Total	**33,105**
Out of centre (OOC)	
OOC Protected Employment Area	43,685
OOC Newbury	0
OOC Thatcham	0
OOC Hungerford	0
OOC Pangbourne	0
OOC Theale	0
OOC Rest of West Berkshire	1,168
OOC Total	**44,853**
Out of town (OOT)	
OOT Protected Employment Area	9,363
OOT New Greenham Park	54,366
OOT Other Business Parks (Easter Park/Benham Valance)	3,966
OOT Rest of West Berkshire	2,825
OOT Total	**70,520**
Total West Berkshire Available B2/B8 Floorspace	**148,478**

Source: Focus CoStar, Jan 2011