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West Berkshire Council

Extraordinary Meeting of West Berkshire District Council

Tuesday, 14th February, 2012

Summons and Agenda

To: All Members of the Council

You are requested to attend an extraordinary meeting of

WEST BERKSHIRE DISTRICT COUNCIL

to be held in the

COUNCIL OFFICES, MARKET STREET, NEWBURY

on

Tuesday, 14th February, 2012

at 6.15pm

Andy Day
Head of Policy and Communication
West Berkshire District Council

Date of despatch of Agenda: Monday, 6 February 2012

AGENDA

1. **APOLOGIES FOR ABSENCE**

   To receive apologies for inability to attend the meeting (if any).

2. **DECLARATIONS OF INTEREST**

   To receive notice of any Declarations of Interest from Members.

3. **CORE STRATEGY: OUTCOMES OF CONSULTATION (C2387) (Pages 1 - 360)**

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Title of Report:	**Core Strategy: Outcomes of Consultation**
Report to be considered by:	Special Council
Date of Meeting:	14 February 2012
Forward Plan Ref:	C2387

Purpose of Report:

To consider the representations received in response to the Core Strategy consultations undertaken between 4th November and 16th December 2011.
To consider whether any revisions need to be made to the Core Strategy in the light of these representations.

Recommended Action:

That Council resolves that:

1. No new information or evidence has arisen through the consultations to warrant major changes being made to the Core Strategy.
2. Following consultation responses from Natural England and the Highways Agency, two minor wording changes to the Core Strategy should be made as set out within the report.
3. The Council's response to the consultations as set out within appendices A-H are agreed.

Reason for decision to be taken: To progress the Core Strategy Examination to get in place an up to date planning framework for the District.

Other options considered: No significant new information was received which would lead to any other option being considered.

Key background documentation:

West Berkshire Submission Core Strategy Incorporating Changes
Revised Sustainability Appraisal/Strategic Environmental Assessment
Schedule of Further Examination Proposed Focused Changes to the West Berkshire Core Strategy (October 2011)
Schedule of Further Inspector Proposed Focused Change to the West Berkshire Core Strategy (October 2011)
Draft National Planning Policy Framework

The proposals contained in this report will help to achieve the following Council Plan Priority:

☒ **CPP1 – Support our communities through the economic downturn** – to alleviate the impact on different communities and individuals who find themselves out of work and/or disadvantaged

The proposals will also help achieve the following Council Plan Themes:

☒ **CPT1 - Better Roads and Transport**
☒ **CPT2 - Thriving Town Centres**
☒ **CPT3 - Affordable Housing**
☒ **CPT4 - High Quality Planning**
☒ **CPT6 - Vibrant Villages**

The proposals contained in this report will help to achieve the above Council Plan Priorities and Themes by:
Putting in place an up to date Core Strategy to proactively guide the future planning of the District.

Portfolio Member Details	
Name & Telephone No.:	Councillor Alan Law - Tel (01491) 873614
E-mail Address:	alaw@westberks.gov.uk
Date Portfolio Member agreed report:	02 February 2012

Contact Officer Details	
Name:	Liz Alexander
Job Title:	Planning Policy Team Leader
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Implications

Policy:	The West Berkshire Core Strategy sets out the strategic direction for the Council's planning policy, setting out the broad strategy for development in West Berkshire to 2026.
Financial:	This can be funded from within existing budgets in 2011/12.
Personnel:	None
Legal/Procurement:	The Planning and Compulsory Purchase Act 2004 (as amended) requires the local planning authority to keep under review the matters which may be expected to affect the development of their area or the planning of its development. The proposed West Berkshire Core Strategy as amended seeks to fulfil this obligation. It should be noted that the failure by the Council to adopt a Core Strategy may result in the Council having no local planning policies in place when determining planning applications. The absence of a Core Strategy would also prevent the Council from adopting a Charging Schedule for the purpose of the Community Infrastructure Levy Regulations 2010, and this will have a significant impact from April 2014 when the Council's ability to seek contributions by way of planning obligations pursuant to section 106 of the Town & Country Planning Act 1990 will be significantly curtailed.

Property:	N/A
Risk Management:	The Council needs to comply with the SA/SEA Regulations and to progress the Core Strategy Examination in order to get in place an up to date planning framework for the District. The risks to development management are much higher without an up to date development plan in place. The planning system is also in a process of change with the enactment of the Localism Bill and the proposed introduction of the National Planning Policy Framework. The need to explore this through the Examination process has caused delay and additional work.
Equalities Impact Assessment:	Stage 1 and 2 EIAs have been completed in tandem with the development of the Core Strategy and are attached as Appendix I to this report.

Is this item subject to call-in?	Yes: ☐	No: ☒

If not subject to call-in please put a cross in the appropriate box:

The item is due to be referred to Council for final approval	☒
Delays in implementation could have serious financial implications for the Council	☐
Delays in implementation could compromise the Council's position	☐
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months	☐
Item is Urgent Key Decision	☐
Report is to note only	☐

Executive Summary

1. Introduction

1.1 This report asks Full Council to approve the response to the recent Core Strategy consultations on the following matters:

(1) The implications of revisions to the Sustainability Appraisal/Strategic Environmental Assessment for the Core Strategy

(2) The Further Examination Proposed Focused Changes (FEPFC)

(3) The Further Inspector Proposed Focused Change (FIPFC)

(4) The implications of the draft National Planning Policy Framework (NPPF) for the Core Strategy.

1.2 The requirement for this work is set out in 3 notes which were published by the Examination Inspector post the June 2011 hearings.

1.3 After considering this on 1 November 2011, Full Council recommended the allocation of the Sandleford Park site from the 3 alternative options shortlisted at the Options for the Future Stage, and recommended a broad locational approach to the East of the District from the 5 options tested at the Options for the Future stage.

1.4 Following approval by Full Council, a 6 week period of consultation took place between 4 November and 16 December.

1.5 The responses to the consultation have been individually summarised and are set out in appendices A-H, with Appendices E-H being the longer submissions which were received. An officer response to each comment is also set out.

2. Conclusion

2.1 Officers do not consider that any new evidence or information has been submitted through the consultation which would require any major changes to the Core Strategy. However, 2 minor wording changes are proposed (one to Area Delivery Plan Policy 5 on the AONB and the other to policy CS14 on Transport) in response to comments from Natural England and the Highways Agency.

2.2 If Members confirm this approach, then the Council's responses to the comments received during consultation will be sent to the Examination Inspector. He will then re-open the Examination, with additional hearings held if necessary.

Executive Report

1. Background

1.1 Members will be aware of the notes published by the Core Strategy Inspector post the June 2011 Core Strategy hearing sessions, which resulted in the Examination being suspended. The work that resulted from the notes was reported to Members at Planning Task Group during October 2011 and then to a special meeting of Full Council on 1 November 2011. In summary the work involved firstly revising the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to set out how decisions were made following Options for the Future, and secondly re-assessing the decisions made after Options for the Future in light of the revisions to the SA/SEA. The Inspector stressed the necessity for Full Council to give objective consideration to the outcomes of the work.

1.2 Following the additional work, Full Council agreed the allocation of the Sandleford Park site from the 3 alternative options shortlisted at the Options for the Future Stage, and a broad locational approach to the East of the District from the 5 options tested at the Options for the Future stage.

1.3 A 6 week period of public consultation then took place between 4 November 2011 and 16 December 2011 on the following matters:

(1) The implications of revisions to the Sustainability Appraisal/Strategic Environmental Assessment for the Core Strategy

(2) The Further Examination Proposed Focused Changes (FEPFC)

(3) The Further Inspector Proposed Focused Change (FIPFC)

(4) The implications of the draft National Planning Policy Framework (NPPF) for the Core Strategy.

1.4 The number of comments received was as follows:

(a) There were 143 reps on the Core Strategy in light of the revised SA/SEA consultation, from 98 consultees.

(b) 58 reps on the draft National Planning Policy Framework from 34 consultees

(c) 11 on the Further Inspector Proposed Focused Change from 11 consultees

(d) 66 on the Further Examination Proposed Focused Changes from 35 consultees

1.5 The comments are summarised and responded to individually in Appendices A-D. Additionally some of the longer submissions are responded to and attached as additional appendices (Appendices E-H).

1.6 Officers do not consider that major new issues have been raised through the consultation, but make one suggested minor addition to the wording of the Area Delivery Plan Policy (ADPP5) for the Area of Outstanding Natural Beauty (AONB) to address a specific objection from Natural England, and one minor change to the

supporting text of policy CS14 (Transport) in response to the Highways Agency (HA). In responding to the comments, the officer response answers the points raised by the respondent, with particular reference to the source of the answer and where this can be found. For example, if a respondent states a concern that " no transport work has been carried out by the Council" the officer answer would refer to the 4 phases of the Transport Assessment, the output of these in terms of infrastructure requirements set out within the Infrastructure Delivery Plan (IDP), the fact that these have been discussed at previous hearing sessions of the Examination and that the information is publically available and where it can be found.

1.7 Sections 2 to 5 summarise the key points received on the 4 consultations and also summarise the officer response. These summaries should be read alongside Appendices A-H.

2. Responses to the Soundness of the Core Strategy in relation to the Revised SA/SEA (Appendix A).

Key Issues 1
Policy CS4 - Sandleford Strategic Site Allocation

2.1 The bulk of the responses related to the allocation of Sandleford Park as a strategic site. During the consultation period, an action group was set up called 'Say No to Sandleford' and the group coordinated additional responses which were sent as an attachment to the main response. This is included within Appendix F.

2.2 An on-line petition against the proposed Sandleford development has attracted over 400 signatures to date only a third of which are from the United Kingdom. This was set up after the consultation period closed.

2.3 Although many of the comments did not refer to the revised SA/SEA, nor relate specifically to policy CS4, officers have responded to the comments received in full. Several lengthy representations have been received and officers have attached these submissions and the officer response separately as additional appendices E-H for ease of reference, to aid the Inspector, and to ensure that the detail is not lost.

2.4 The main comments made together with the officer response (which specifically highlight where the information can be found in publically available documents on the Council's website) were as follows:

(1) Concerns over the site selection process including comments that changes to the scoring system used in the SA/SEA in 2009 have resulted in Sandleford being selected as a strategic site.

The officer response to this point summarises the evolution of the scoring system in the SA/SEA from the Site Selection Framework onwards, with reference to the full documentation. The wider site selection process is explained, with reference to the fact that the Site Selection Framework was only part of the process of selecting the sites. This explains how Sandleford Park in combination with Newbury Racecourse, was agreed by PTG following the Options for the Future consultation (May to July 2009) and then at Full Council in January 2010.

(2) Comments that Sandleford Park has been assessed in a different way from other reasonable alternative sites.

The officer response to this point is that Sandleford Park has been assessed in a consistent fashion to the other promoted strategic sites and this is explained, with reference to the range of factors from the evidence base (e.g. flood risk assessments, transport assessments) as well as, for example, other factors such as national guidance and the emerging vision for the Core Strategy, which all need to be taken into account.

(3) That brownfield sites are available in sufficient quantities in Newbury to prevent the need for a greenfield strategic site.

The officer response with regards to brownfield sites, explains that the Core Strategy has taken the availability of brownfield sites into account. No respondent has detailed where 1,000 units could be developed on brownfield land in Newbury, but instead make more general references to the perceived availability of 'employment sites' etc.

(4) That developing Sandleford would worsen existing traffic problems and cause new traffic problems.

The officer response in relation to traffic issues, cross refers to published information in the form of the Transport Assessments and the outcome of these in terms of any necessary infrastructure improvements to deliver the development which are set out in the Infrastructure Delivery Plan (IDP). It also states that whilst modal shift will be actively encouraged, it is not assumed that this will affect traffic generation in the Transport Assessment Phase 4.

(5) Other infrastructure concerns, including over future educational provision, with some specific references to the acceptability of extending Park House School.

The officer response on education has been discussed and agreed with the Council's Education Department and refers to the preferred approach being the remodelling of the existing Park House School.

(6) Complaints over a lack of consultation, and some specific comments about the consultation system used by the Council.

The officer response regarding comments on the previous consultation processes have been responded to via cross references to the published Statements of Consultation which are published on the Council's website and explain what consultation has been carried out at different stages of the Core Strategy and how the comments made have been taken into account. In terms of complaints about the current consultation, officers have tried to make it as clear as possible for respondents, whilst complying with the regulatory process. As well as the on-line consultation system, it has been possible to respond to the consultation via email or letter, or using hard copies of the forms which were available in libraries and from the Council offices.

(7) Comments that whilst the outcome of public consultation has been taken into account in the Eastern area, this has not been the case in Newbury.

The officer response with regard to the outcome of public consultation in the east, explains that public consultation only forms part of the evidence base, and is taken into account alongside the technical evidence base. The outcome of public consultations, together with technical concerns were reasons for not taking forward strategic site options in the east of the District.

(8) Landscape concerns with specific reference to the Capability Brown landscape.

The officer response with regard to landscape, explains that the Sandleford proposal does not include any of the historic parkland and that the areas adjacent are proposed to be protected from development in perpetuity.

Key Issues 2

2.5 Apart from the CS4 Sandleford Park comments, other key comments on the implications for the Core Strategy arising from the changes to the SA/SEA are as follows:

(1) In terms of CS7 (affordable housing) comments that the policy is not justified in the light of viability evidence.

The officer response is that the affordable housing policy is flexible enough to accommodate a lower provision of affordable housing if fully justified by the developer.

(2) A comment on CS9a (AWE) from Bovis Homes who are promoting a site at Tadley and think that the policy is too restrictive.

The officer response in terms of CS9a, the policy is not considered too restrictive and applications will continue to be discussed on a case by case basis with the Office for Nuclear Regulation (ONR).

(3) Several comments on the Area Delivery Plan (ADP) policies, either requesting higher numbers or promoting sites - e.g. at Burghfield, at Whitehart Meadow and west of Donnington Village.

The officer response in terms of the ADP policies is that it is not necessary to change these and there was not new evidence submitted to suggest that different numbers or allocations would be appropriate at this stage of the Core Strategy process. Detailed housing numbers and non strategic allocations will be set out within the Site Allocations and Delivery DPD.

(4) In respect of the AONB - some support for the changes which give a maximum number of 2000 for the AONB and other respondents thinking that the number is too high and that it will have negative landscape impacts.

The officer response in respect of the AONB response is set out in the response to the FPEFCs (3.1(3) below).

(5) Some comments about infrastructure provision, specifically with regards to water supply at Sandleford.

The officer response in terms of infrastructure provision, is that this work has been carried out in conjunction with infrastructure providers and included within the Infrastructure Delivery Plan (IDP). Water extraction has been discussed with Thames Water throughout the development of the Core Strategy. They have confirmed the sufficiency of the local water supply network.

(6) A comment from the Highways Agency requesting rewording of the policy in paragraph 5.67 (the supporting text of policy CS14 (Transport) to say "Where a Transport Assessment for a significant development illustrates that there will be ~~a material reduction in capacity on~~ an impact on the capacity of the SRN, the developer will need to undertake detailed traffic modelling in accordance with national guidance".

The officer response in terms of the Highways Agency recommendation, is to propose a minor amendment to paragraph 5.67 as follows:

> "Where a Transport Assessment for a significant development illustrates that there will be ~~a material reduction in capacity on~~ an impact on the capacity of the SRN, the developer will need to undertake detailed traffic modelling in accordance with national guidance".

3. Responses on the Further Examination Proposed Focused Changes (Appendix B)

3.1 A wide variety of comments were received and these are set out in Appendix B. The key themes were as follows:

(1) Comments either in support or opposing the introduction of 'at least' into the 10,500 figure in FEPFCs 2, 3 and 11 with concern either that the figure is too limited or not limited enough.

The officer response to the issue of the housing numbers has been discussed in full at the Core Strategy Examination hearings, and the wording was requested by the Inspector to clarify that 10,500 is not a cap.

(2) On FEPFC6, comments again either in support or opposing the introduction of wording regarding the release of greenfield sites adjacent to the settlement boundary at Thatcham.

The officer response is that the wording change regarding greenfield sites at Thatcham was to add consistency with the other Area Delivery Plan policies and was requested by the Inspector to clarify that not all of the proposed development at Thatcham could take place on previously developed land.

(3) A range of comments were received on FEPFC9, which is a change to the AONB policy regarding the housing numbers to be found in the area, and to clarify that the provision of this housing is subject to the overarching objective for the AONB. A specific issue that has arisen from consultee Natural England is whether or not policy ADPP5 is clear

enough about how the policy should be applied, specifically about what 'appropriate and sustainable growth that conserves and enhances its special landscape qualities' means in practice. In response to this, some revised wording is proposed (see below).

The officer response to the AONB change, and to reflect the concerns identified by Natural England, is that for further clarification, the Housing sub section bullet point 2 could be amended to read:

'There will be further opportunities for infill development and for development on previously developed land. New housing allocations will be focused on the Rural Service Centres and Service Villages within the North Wessex Downs, with the emphasis on meeting identified local needs. The development will be allocated through the Site Allocations and Delivery DPD or a subsequent planning document, and will depend on the role and function that the settlement performs, supported by suitable development opportunities, identified through the Strategic Housing Land Availability Assessment (SHLAA). The conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing these sites.' Members' views are sought on this potential change.

(4) FEPFC13 clarifies that development on greenfield sites will be required and is largely supported by respondents, with one objection on the basis that development should take place on brownfield sites.

The officer response is that the wording was a clarification request by the Inspector, and has not changed the principle of the policy.

(5) FEPFC18 refers to policy CS9a, specifically with regard to the Boundary Hall decision and the future role of Tadley.

The officer response is that the Boundary Hall issue was discussed in full at the June 2011 hearing session and no further action is required.

(6) FEPFC19 refers to CS10 and some comments sought the use of employment sites for mixed use developments including housing, which they thought would eliminate the need for the Sandleford allocation.

The officer response in terms of employment is that whilst the importance of mixed use development is recognised, this must be in appropriate locations. It is essential that the health of the District's employment areas is maintained to allow for economic growth. The policy is sufficiently flexible to allow for appropriate alternative uses in appropriate locations.

4. Responses to the Further Inspector Proposed Focused Change (Appendix C)

4.1 There was only one FIPFC, which was in relation to the AONB, where the Council did not support the wording proposed by the Inspector. 3 comments in support and 6 objecting to the Inspector's wording were received, with 2 not specifying whether they objected or supported the change. Officers set out above that further

clarification could be provided on the Council's wording, specifically to overcome the objection from Natural England.

5. Responses on the Soundness of the Core Strategy in relation to the draft National Planning Policy Framework (Appendix D)

5.1 There were a wide range of comments arising from the draft NPPF. The key common issues are as follows and the full comments and responses are set out in Appendix D

(1) 8 respondents thought the Core Strategy was in accordance with the NPPF. Others made the point that it is premature to assess the Core Strategy against the NPPF, given that it is likely to be substantively changed.

The officer response in terms of the weight to be given to the draft NPPF as a material consideration, is that the Council recognises that this is a draft and therefore likely to change in some respects. However, the comments made through consultation have been responded to in full, as the Inspector requested.

(2) The draft NPPF promotes growth and an increase in the housing supply, whilst the Core Strategy artificially constrains growth through insufficient allocations.

The officer response, the Council has given evidence through the Examination process as to why 10,500 is an appropriate housing figure for the District, and how there is flexibility regarding this figure set out within the Core Strategy. Through the recent consultation, the Council has confirmed that this figure is not a ceiling and will be reviewed at an appropriate time. Any review will be undertaken based on clear and up to date evidence.

(3) The emphasis on mixed use development is not carried through in the Core Strategy.

The officer response is that mixed use developments are facilitated in the Core Strategy, with specific examples referred to. The benefits of mixed use development are recognised and policy CS10 has been revised through the Examination process to enable this in appropriate locations.

(4) Given the emphasis on a 'duty to cooperate' in the draft NPPF, the Core Strategy should pay more regard to cross boundary issues such as to the role of Tadley, and the role of Reading.

The officer response with regard to the duty to cooperate, the Core Strategy clearly recognises cross border issues and builds on the existing settlement pattern with a focus on the urban areas in the East of the District and on Newbury and Thatcham. Tadley has therefore not been recognised as an appropriate location for strategic level development, but smaller amounts of development will be assessed through the Site Allocations and Delivery DPD.

(5) The Core Strategy evidence base is out of date and this is contrary to the draft NPPF.

The officer response is that the evidence base is not out of date, it is the evidence base on which the Core Strategy was developed and it would not be appropriate to constantly stall the Examination process to refresh it. A review of relevant parts of the evidence base will be carried out as part of the preparation of the Site Allocations and Delivery (SAD) DPD (or Local Plan).

(6) The Core Strategy does not plan sufficiently for economic growth, given the priority given to this within the draft NPPF

The officer response is that in terms of economic growth, policy CS10 of the Core Strategy is based on the evidence set out within the Employment Land Assessment. This aims to protect the health of the local economy by carrying forward the Protected Employment Area designation.

(7) Some comments that the Area Delivery Plan policies do not give sufficient guidance for Neighbourhood Plans in terms of housing numbers.

The officer response with regard to Neighbourhood Plans, is that the SAD DPD will be prepared in conformity with the Core Strategy and will identify specific sites.

(8) The Core Strategy does not ensure good access to high quality public transport (with specific regard to Sandleford).

The officer response is that CS14 on Transport provides the appropriate Core Strategy policy and all planning applications will need to demonstrate how they will improve travel choice and reduce car use.

6. Next Steps

6.1 Appendices A-H to this report were considered by Planning Task Group on 27 January and by Management Board on 2 February.

6.2 The outcome of the consultation is that on the basis of the responses received, apart from a minor proposed wording change to the AONB policy (ADP5) and to policy CS14 (Transport), there are no new issues or evidence which require additional changes to the Core Strategy

6.3 Full Council is invited to agree that on the basis of the comments set out in the appendices to this report, that they confirm this approach.

Appendices

Appendix A: Schedule of responses to the soundness of the Core Strategy in light of the revised SA/SEA.
Appendix B: Schedule of Responses to the Further Examination Proposed Focused Changes.
Appendix C: Schedule of Responses to the Further Inspector Proposed Focused Change.
Appendix D: Schedule of Responses to the draft National Planning Policy Framework.

Appendix E: Representation from the West Berkshire Liberal Democrat Shadow Executive
Appendix F: Representation from the Say No to Sandleford Campaign (SNTS).
Appendix G: Representation from The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement.
Appendix H: Representation from Pegasus Planning Group Ltd on behalf of Henry Davidson Developments Ltd and TA Saunders Trustees.
Appendix I: Equality Impact Assessment Stages 1 and 2.

Consultees

Local Stakeholders:	Ongoing as part of the Core Strategy process
Officers Consulted:	Ongoing as part of the Core Strategy process
Trade Union:	N/A

3.	**Result** (please tick by clicking on relevant box)
☐	**High Relevance** - This needs to undergo a Stage 2 Equality Impact Assessment
☐	**Medium Relevance** - This needs to undergo a Stage 2 Equality Impact Assessment
☐	**Low Relevance** - This needs to undergo a Stage 2 Equality Impact Assessment
☒	**No Relevance** - This **does not** need to undergo a Stage 2 Equality Impact Assessment

For items requiring a Stage 2 equality impact assessment, begin the planning of this now, referring to the equality impact assessment guidance and Stage 2 template.

4.	**Identify next steps as appropriate:**
Stage Two required	
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	
Stage Two not required:	

Name: **Date**:

Index to Appendices A-D

Appendices A to D contain a summary of each of the comments made in response to the consultation, together with the proposed Council response.

Appendix A (Consultation 1) pages 17 to 130

Implications of revisions to the Sustainability Appraisal/Strategic Environmental Assessment for the soundness of the Core Strategy

Appendix B (Consultation 2) pages 131 to 180

Further Examination Proposed Focused Changes (FEPFC) to the Submission Core Strategy.

Appendix C (Consultation 3) pages 181 to 188

Further Inspector Proposed Focused Change (FIPFC) to the Submission Core Strategy,

Appendix D (Consultation 4) pages 189 - 232

Soundness of the Core Strategy in relation to the draft National Planning Policy Framework (NPPF)

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APPENDIX A

Submission Core Strategy in light of revised Sustainability Appraisal/Strategic Environmental Assessment Report

This table sets out a summary of each individual representation received in response to the consultation on the soundness of the Core Strategy in relation to the revised Sustainability Appraisal/Strategic Environmental Assessment Report. It also sets out the officers' proposed recommendation as to how the Council should reply.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
West Berkshire Submission Core Strategy Incorporating Further Examination Proposed Changes					
Mr D W Bending		Yes	Yes	The SA has been carried out with due diligence and is properly supportive of the detail of the Core Strategy in general and particularly as regards site selection including the Sandleford site. The major concentration of development in urban areas is sensible and justifiable as is the high degree of protection afforded to parishes within the AONB.	Support noted. No response required.
Dr David Cooper		No	No	This consultation is an abuse of process. Specifically, it requires over 15 seconds to display each page, making it extremely difficult to view and comment on the document.	The responsiveness of the online consultation will vary depending on a number of factors including the respondent's internet connection, the computer hardware used and even the time of day the response is submitted. The consultation documents were also made available to view in hard copy at all of the District's libraries and at the Council Offices.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Streatley Preservation Action Group		Yes	Yes	Although complex and at times difficult to read, the methodology is clear. The explanation of the decision making process for the strategic sites selection is very comprehensive and clear. The evidence / conclusion is clear and obvious	Support noted. No response required.
Cllr Alan Law		Yes	Yes	Supports. The Strategic Site selection process, as explained in the Strategic Sites Document and associated appendices within the SA/SEA, is comprehensive and clear. The evidence presented clearly supports the recommendation for the RaceCourse and Sandleford Park as the two Strategic site locations.	Support noted. No response required.
Network Rail		Not specified	Not specified	No comment.	No response required.
The Theatres Trust		Not specified	Not specified	No comments to make	No response required.
Introduction					
West Berkshire Council Environmental Health		Yes	Yes	n/a	Noted. No response required.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Relationship with Other Strategies					
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	The SA/SEA does not make clear what level of housing above the RSS target was assessed - fails to assess all reasonable alternatives. Requirement to conform to South East Plan has little consequence. Evidence of housing need is far in excess of the 11,000 dwellings assessed in the SA. Retro-fitting of SA/SEA to fit already unsound Core Strategy does not meet requirements of PPS12 which states that SA should provide a sound evidence base upon which to base policy.	The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with the sustainability appraisal. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
Evidence Base					
Gladman Care Homes Ltd		Not specified	No	Evidence base should include: West Berkshire Supporting People Strategy 2005 - 2010, Supporting People Strategy Review 2008 - 2012, Housing Strategy 2010-2015, Putting People First 2011 - 2012 Refresh. Key findings of these documents, relating to older people and their needs for accommodation, should be considered.	Relevant local level plans/policies/programmes were reviewed in the SA (appendix 3), including Housing Strategy 2005-2010. In addition, the Core Strategy Core Document list lists CD10/14 West Berkshire Supporting People Strategy 2005-2010, and CD10/12 Housing Strategy 2005-2010. The Council's Housing department have been actively involved in the development of the Core Strategy. The Council therefore considers that the relevant approach has been taken in relation to older people and their needs within the Core Strategy; however more detail may be appropriate for the forthcoming Site Allocations and Delivery Development Plan Document. No change to the SA

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					required.
Strengths, Weaknesses, Opportunities and Threats					
Health and Safety Executive		Not specified	Not specified	Page 17 Headed Background and Challenges - final bullet delete this part of the sentence 'Health and Safety Regulations'.....which is factually incorrect. If text is still required to alert readers to development constraints in E Kennet I suggest you reference out to policy CS9A and or use the wording in section 4.11d on page 26	Comment does not relate to the SA/SEA, however table 2 in the Schedule of Further Proposed Minor Changes version 7, lists superseded fpmc's. This bullet point is deleted in fpmc 152 in response to the Inspector's note of 13 July 2011. The change was omitted from the Core Strategy Incorporating Changes in error.
Strategic Objectives					
Greenham Parish Council		Yes	No	Timings and delivery is in the hands of developers, how can WBC say that homes will be delivered in an effective and timely manner? Brownfield sites cannot be maximised if 20% of future housing is on greenfield land. There is no evidence that South Newbury / Greenham needs the amount of affordable housing units that will be provided by both strategic sites being in one ward. Putting affordable housing where there is insufficient employment means that lower-paid jobs in the district will go unfilled because people will not be able to afford to get to them.	The SA for the Spatial Strategy is set out in Housing Distribution SA Policy Paper and the Spatial Strategy SA Policy Paper. The Core Strategy recognises that previously developed land (PDL) would not be sufficient to accommodate the level of housing development required and that some greenfield development will be inevitable. The Housing Need Assessment 2007 (part of the Strategic Housing Market Assessment, DTZ, 2007) and the current Housing Register show that the need in the District is extremely high Both strategic sites are close to facilities and the town centre and so are ideally located for those on low incomes to access services. Policy CS4 outlines that business development will be provided on site along with retail facilities, both of

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					which will generate employment, as well as jobs from existing facilities in the south Newbury/Greenham area.
Section 4: The Spatial Strategy					
Pangbourne Parish Council		Yes	Yes	Pangbourne Parish Council are very supportive of the Strategic Site selection process and the AONB policy.	Noted. No response required.
Miss Lois Mason		Not specified	No	Road infrastructure would not be able to take increased volume of traffic produced by 2000 homes at Sandleford, site is too far and is uphill from Newbury town centre so people would have to use cars, already there are issues at Monument Close facilities. The use of Sandleford such a large percentage of the new housing proposed for the area is not in line with PPS3 as it is a greenfield site. Building more than 300 houses on the Sandleford site will mean worse lives for all who have to live and work and travel through the south side of Newbury and worse lives for future generations .This proposal for 2000 houses at the Sandleford site is NOT SUSTAINABLE, not justified, as there is potential nearer to the centre of Newbury, for mixed use developments which would deliver the housing required.	There have been four phases to the Core Strategy Transport Assessment which have been carried out through the development of the Core Strategy. Appendix Cii of the Core Strategy sets out the critical infrastructure required to deliver the strategy. The SA for the Spatial Strategy is set out in Housing Distribution SA Policy Paper and the Spatial Strategy SA Policy Paper. The Core Strategy recognises that previously developed land (PDL) would not be sufficient to accommodate the level of housing development required and that some greenfield development will be inevitable. The housing distribution and settlement hierarchy have been developed through the extensive consultation and evidence base. As set out in Policy CS1, new homes will be primarily developed on suitable previously developed land within settlement boundaries, other suitable land within settlement boundaries, strategic sites and broad locations identified on the Core Strategy Key Diagram, and land allocated for residential development in subsequent Development Plan Documents. The Council does not consider the Spatial Strategy to be

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					contrary to National Planning Policy. No changes are required to the SA.
Greenham Parish Council		Yes	No	Stated [in the SA] that 'The spatial strategy policies (ADPP SP 1 to 6)....' Later the same para says that 'The area policies of ADPP SP 2 to 6 explain further how the spatial strategy policy ADPP SP 1 will be delivered'. Are ADPP SP 2-6 spatial policies or area polices? Are ADPP 2-6 subservient to ADPP SP 1 or are all 6 on an equal footing? The EPFCs at page 41 state 'Some examination proposed focused changes have been proposed for the spatial policies. The spatial policies have been re-named Area Delivery Plan Policies but the numbers remain the same. The changes relate to ADPP1 to 6'. Does this mean that the continual reference to 'spatial policies ADDP SP 1-6' throughout the CS is incorrect?	The policies within section 4: The Spatial Strategy of the Core Strategy have been renamed since submission. This is explained in the SA Report, the Spatial Strategy SA Policy Paper and shown throughout as tracked changes. Submission stage Spatial Policy SP1: Spatial Strategy is now called Area Delivery Plan Policy 1: Spatial Strategy. The spatial areas at Submission (which explain further how the Spatial Strategy will be delivered) SP2 – 6, are now called Area Delivery Plan Policies 2 – 6. The policies ADPP1 – 6 make up the Spatial Strategy section of the Core Strategy. The references to ADPP1 – 6 within the Core Strategy and the SA are correct, and where relevant are shown as tracked changes within the SA.
Spatial Strategy (ADPP1)					
Mr Tony Hammond		Yes	No	There is no mention here of the contribution and identification\use of brownfield sites, despite the maximisation of this land being a strategic objective. Neither are there examples of brownfield site developments in the specific Spatial Strategies, whilst Core Policy CS1 goes further and says "Greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas to accommodate the required housing" without any analysis or reference to an analysis that the brownfield strategic objective cannot be achieved.	This representation does not relate to the SA and changes made in the SA. However, ADPP1 states "Most development will be within or adjacent to the settlements included in the settlement hierarchy" and will in part be dependent on the "availability of suitable sites for development". The policy also states that "The majority of development will take place on previously developed land". The Core Strategy strategic objective 2: Housing Growth talks about maximising the use of suitable brownfield land. Policies ADPP1 and CS1 provide the strategy for how this will be achieved. The

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				Suggested that one reason for choosing Sandleford as a strategic site was that it was easier to administer as a single block than have to deal with numerous smaller developments (which a brownfield strategy would imply).	Spatial Strategy and Housing Topic Paper September 2010 (CD08/06) provides a summary of the policy background and evidence which has led to the proposed policies for the Spatial Strategy and for the provision of new housing in the period to 2026. The SHLAA identifies potential sites for housing, including brownfield sites, and has been regularly updated through the development of the Core Strategy. Evidence shows that greenfield sites will be needed to accommodate the required housing. The Site Allocations and Delivery Development Plan Document will identify specific sites to accommodate the broad distribution of housing set out in the Area Delivery Plan policies (as stated in Policy CS1).
Mrs Kim Whysall-Hammond		No	No	Document does not talk about the contribution and identification\use of brownfield sites, despite this land being on the list of strategic objective (no.2) for housing. In contrast, Section 4.11a mentions both the Racecourse and Sandleford sites, thus, the two strategic options go against one of the primary strategic objectives. No examples of brownfield site developments in the specific Spatial Strategies, whilst CS1 says "Greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas to accommodate the required housing" with no reference to any analysis as to why the brownfield strategic objective cannot be achieved. The Spatial strategy fails to describe why the overall strategic objective of using brownfield sites cannot be met.	This representation does not relate to the SA and changes made in the SA. However, ADPP1 states “Most development will be within or adjacent to the settlements included in the settlement hierarchy” and will in part be dependent on the “availability of suitable sites for development”. The policy also states that “The majority of development will take place on previously developed land”. The Core Strategy strategic objective 2: Housing Growth talks about maximising the use of suitable brownfield land. Policies ADPP1 and CS1 provide the strategy for how this will be achieved. The Spatial Strategy and Housing Topic Paper September 2010 (CD08/06) provides a summary of the policy background and evidence which has led to the proposed policies for the Spatial Strategy and for the provision of new housing in the period to 2026. The SHLAA identifies potential sites for

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					housing, including brownfield sites, and has been regularly updated through the development of the Core Strategy. Evidence shows that greenfield sites will be needed to deliver the required housing. The Site Allocations and Delivery Development Plan Document will identify specific sites to accommodate the broad distribution of housing set out in the Area Delivery Plan policies (as stated in Policy CS1).
Croudace Strategic Ltd	Boyer Planning Ltd	Yes	No	The SA does not justify why higher figure of 11,000 was not used as the baseline as not found to have significantly greater impact than the 10,500. A greater proportion of the housing allocation should be directed towards Thatcham in recognition of its status in the settlement hierarchy and relationship with Newbury in strategic terms.	The Strategic Sites SA Policy Paper sets out in section 11 the reasons for the reduction in 500 homes, to deliver 10,500. This section also explains how Sandleford could begin delivering development later on in the plan period (from 2016 onwards) but with capacity to continue, either after 2026 to provide long term flexibility, or before if land supply monitoring shows that it was necessary, or if the housing requirement increased. The Delivering New Homes and Retaining the Housing Stock SA Policy Paper includes the appraisal of options for housing numbers and the development of policy CS1. The paper shows that the provision of 11,000 dwellings and an option of above 11,000 dwellings would have predominantly neutral overall effects. It states “The Inspector, in his comments, concluded that there was evidence of a need and demand for an increase to the housing numbers...To this end, the wording has been amended to enable the housing target to be exceeded both annually and post the 2026 period.” The Council has taken account of the effect of the delay in the likely adoption of the Core Strategy with the addition of FEPFC15, which proposes that the annual housing requirement is carried forward

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					beyond 2026. In relation to Thatcham, the word 'approximately' provides some flexibility for more homes than stated. Work on the Site Allocations and Delivery DPD will lead to more precise allocations to the spatial areas.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	The SA/SEA does not make clear what level of housing above the RSS target was assessed - fails to assess all reasonable alternatives. Evidence of housing need is far in excess of the 11,000 dwellings assessed in the SA.	The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with the sustainability appraisal. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	No	Council's approach to assessing sustainability was based on an informal and unstructured basis lacking in rigour, ignoring relevant guidance and relying very much on the officers' personal views. That, for example, the officers were content to accept further information from the promoters of the Sandleford site without also undertaking the same exercise with promoters of all the other sites results in the whole exercise lacking any credibility.	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with

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				The Council has consistently failed to take into proper consideration the potential for development to the north of Tadley. Request that the SA be rerun to properly assess the comparable merits of Silchester Road, Tadley as a suitable and sustainable strategic site.	service providers to inform the process. Council Members have been involved in the process throughout. All sites have been assessed on a consistent basis. The potential strategic sites have been through various stages of appraisal throughout the development of the Core Strategy. Paragraph 4.4 of the Strategic Sites SA Policy Paper explains why the Silchester Road, Tadley site was eliminated from the consideration of strategic sites. SEA practical guide (CD04/04) para 5.B.7 “It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent”. The Strategic Sites SA Policy Paper sets out in detail the SA and decision-making process for the selection of the proposed strategic sites in the Core Strategy.
Newbury and Thatcham (ADPP2&3)					
Ressance Limited		Yes	No	In respect of the bullet point "Any new office development will be directed towards the town centre and existing office developments uses given protection protected as set out in Policy CS 10”. The Council has misinterpreted the ELA in respect of the demand and need for B1 office accommodation. The average uptake value in the ELA excludes the peak caused by Vodafone's new HQ but includes premises	Paragraph 3.26 of the West Berkshire Employment Land Assessment (ELA, 2007) states that ‘in reality plot ratios vary from site to site, this figure (40%) provides an indicative estimate of future requirements and is the recommended plot ratio according to ODPM/DCLG Guidance’. The ELA has considered this matter and concluded that the use of

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				built for Vodafone prior to its relocation. The average post Vodafone's relocation is far lower than the long term average. The effect of factoring this in dramatically reduces the amount of employment land required. Furthermore the Council appears to have ignored the Consultants comments about B1a (office) being built at higher density than B1c and/or B2. The land use ratio is therefore far more efficient in the case of offices, especially in or close to town centres. The bullet point should be less prescriptive and more flexible. In the interest of encouraging economic regeneration the Council should invite evidence to be submitted with each application which should take in to account particular location and other characteristics.	a standard plot ratio is appropriate. Policy CS10 does promote the intensification and redevelopment of existing employment sites and premises and allows for the loss of office floorspace within existing centres if it can be demonstrated that the proposal maintains the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy period in that centre. No change proposed to the bullet point.
Cllr Jeff Beck		Not specified	Not specified	Newbury/Thatcham Gap: this area provides an important amenity space for people from Cold Ash, Newbury and Thatcham. North Newbury: I endorse the disadvantages of this Strategic Site, in particular with respect to the potential increase in risk arising from flooding and the extensive alleviation measures that would be required to bring about a Sustainable Drainage Solution.	Comments noted.
Sandtrend Ltd		No	No	Submission on behalf of owner of site NEW064 (to the west of Donnington Village) that the site should be classed as potentially developable along with NEW031 and NEW050 (the North Newbury site)	This site was not considered as a potential strategic site for a number of reasons including its location on the western side of Donnington village, not immediately adjacent to the Newbury settlement boundary. It would be likely to have significant

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					issues related to heritage assets - Donnington Castle, Conservation Area etc. and impact on the setting of Donnington village. It is has been assessed through the Strategic Housing Land Availability Assessment as not developable.
Mr Graeme Panting		Not specified	No	Newbury/Thatcham gap already not sufficiently protected. Bus services connecting with railway station and enhancement of High Street, Thatcham not covered.	The Newbury/Thatcham gap is protected in that it lies outside the settlement boundaries of Newbury and Thatcham, where policies for the countryside apply. Policy CS20 and para 5.116 make clear that landscape character assessment will provide the framework for informed decisions to be made about future development rather than through the use of local landscape designations. Policy ADPP3 does say that the town centre will be regenerated – the Thatcham Town Centre Design Appraisal forms part of the evidence base. It also states that opportunities will be maximised to provide better connections and maximise accessibility linkages between the town centre and Thatcham Railway Station.
Eastern Area (ADPP4)					
Capital Corporation Projects Ltd	Bell Cornwell	No	No	Whitehart Meadow site, Theale, scored highly in strategic site appraisal process and is suitable location for new development in the Eastern Urban Area. Site's advantages should be properly recognised by the Council by the inclusion of a higher housing target for the Eastern Urban Area.	The site at Whitehart Meadow was assessed through the SA/SEA and the Combined Strategic Housing Sites Appraisal Documents. It was not taken forward as a strategic site as it was considered that development of this scale would have a considerable impact on Theale and would negatively impact upon the role and function of Theale, identified as a Rural Service Centre. The

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					impact on the identity of Theale and the concern over the in-combination impact of the development with the already committed development of 350 units at Theale Lakeside were major considerations. The site will be further evaluated during the preparation of the Site Allocations and Delivery DPD but commitment to a higher allocation for the Eastern Area is not considered appropriate in light of the limited land availability in the spatial area and the decision that strategic scale development is not the preferred way forward in this area. The housing numbers and distribution for the Eastern Area was discussed at the hearings on 29 June 2011.
North Wessex Downs AONB (ADPP5)					
Mr Keith Carter		Yes	Yes	Support the changes which now give a clear maximum number of 2000 for the AONB. Support the confirmation that if adhering to the protection of the landscape priority causes a shortfall on this number then the balance will be allocated to sites outside of the AONB. The sites at Compton and Hermitage should be mentioned in the document and should be given priority over any greenfield sites in the AONB, both to meet the WBC brownfield ratio target, and to comply with national policy.	Support noted for the clear recognition that landscape protection of the AONB is an overarching objective. The Council's proposed wording is different from that proposed by the Inspector, in that it is designed to provide an element of flexibility in development management terms. The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan period if 2,000 homes had already been delivered. Support noted for any shortfall to be met in other spatial areas. The sites at Compton and Hermitage are mentioned in the document. Policy ADPP5 describes them as

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					opportunity sites which could potentially provide a greater level of growth than that normally expected in a service village. There is as yet no clarity about timescales for developing them or the appropriate scale of development.
Ms Liz Horne		Yes	Yes	Support the change that the number of houses will now only be up to 2000 in the AONB. Also support the confirmation that any shortfall in this number will be allocated outside of the AONB. The clear recognition that landscape protection of the AONB is an overarching objective is also welcomed.	Support noted for the clear recognition that landscape protection of the AONB is an overarching objective. The Council's proposed wording is different from that proposed by the Inspector, in that it is designed to provide an element of flexibility in development management terms. The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan period if 2,000 homes had already been delivered. Support noted for any shortfall to be met in other spatial areas.
Pangbourne Parish Council		Yes	Yes	Pangbourne Parish Council are very supportive of the Strategic Site selection process and the AONB policy.	Support noted
Hungerford Town Council		Not specified	Not specified	The Landscape Sensitivity Assessment (LSA) clearly states that major development should not take place in the AONB, except in exceptional circumstances, The inspector has requested that WBC clarify housing numbers proposed for development in the AONB. This is not currently clearly defined in the Core Strategy. We believe the number of houses	The proposed wording change clearly states that the overarching objective in the AONB is the conservation and enhancement of the special landscape qualities and the policy is clear that provision will be made for delivery of up to 2,000 dwellings. The Council does not accept that the level of development should be related to meeting

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				proposed will exceed the housing actual needs in the AONB which should be the proper measure rather than a level determined by developers. Increased traffic levels would have a permanent and extremely detrimental effect on trade and the economic viability of Hungerford High Street	affordable housing needs only. The Council contends that a policy constraining market housing would not meet the Council's objectives, set out in various policy statements, to foster sustainable rural communities. Market housing is an important means of providing for affordable housing to meet local needs and of supporting local services and facilities. Work on the Site Allocations and Delivery DPD will examine all aspects of the sustainability, including transport impacts, of the options under consideration.
Croudace Strategic Ltd	Boyer Planning Ltd	Yes	No	Pleased to see that the proposed changes to the ADPPs will have predominantly positive effects. We are however concerned that the assessment of the amended wording for the AONB Policy produces similar findings to those previously, as we do not understand how the development of 2,000 dwellings within this protected area could not have significant negative impacts. The housing target for the AONB is too high for the special status of the area. A greater proportion of the housing allocation should be directed towards Thatcham in recognition of its status in the settlement hierarchy and relationship with Newbury in strategic terms.	The proposed wording change clearly states that the overarching objective in the AONB is the conservation and enhancement of the special landscape qualities and that if there are insufficient developable sites to provide 2,000 homes over the plan period the shortfall will be provided elsewhere. Any allocation to other spatial areas would be in accordance with Policy CS1 and the Area Delivery Plan Policies, and would take account of the District settlement hierarchy. The position with regard to completions and commitments within the AONB at March 2011 is that 788 additional homes have been delivered since 2006 and permission remains for a further 447 (See LDF Annual Monitoring Report 2011). Delivery of 2,000 homes up to 2016 would imply an annual average delivery of 80 units in the AONB from 2011 to 2016 compared to the 155 units per annum delivered from 2006 to 2011.

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					The position regarding development at Thatcham and the Council's approach regarding consolidation has been discussed at the Examination hearing sessions and is set out in ADPP3.
Gerald Palmer Eling Trust	West Waddy ADP	Not specified	No	As the proposed amendments would produce a policy that imposes a maximum but no minimum number of dwellings, the policy could be complied with by not permitting a single further dwelling over 74% of the Council's administrative area. Indeed once the 2,000 limit is reached it would prevent even development solely for affordable housing on rural exception sites from being approved. With high need for affordable housing and 2 large brownfield sites in AONB, the 900 dwellings still to be built\permitted looks a tight figure without imposing it as a cap, which does not need to be met and cannot be exceeded	Though no minimum number is set out in the policy it clearly states the objective of appropriate and sustainable growth, set within the limitations of the overarching objective to conserve and enhance the special landscape qualities of the AONB. The Council's proposed wording for this policy is different from that proposed by the Inspector, in that it is designed to provide an element of flexibility in development management terms. The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan period if 2,000 homes had already been delivered. The position with regard to completions and commitments within the AONB at March 2011 is that 788 additional homes have been delivered since 2006 and permission remains for a further 447 (See LDF Annual Monitoring Report 2011). Delivery of 2,000 homes up to 2016 would imply an annual average delivery of 80 units in the AONB from 2011 to 2016 compared to the 155 units per annum delivered from 2006 to 2011.
The East Kennet Valley (ADPP6)					
Mr Paul Lyall		Yes	No	A change to this section indicates that Burghfield and Mortimer will be the focus for development in the East Kennet Valley.	FEPFC10 makes it clearer that the rural service centres are the most sustainable settlements in the East Kennet Valley spatial area and was requested

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				Section 4.11 states what sort of development RSC might bear and what sort of development 'settlements below the Service Village level' might bear. Nowhere is there outlined a process for resolving the tensions that might arise when these two policies are in conflict. Concerned that any development adjacent to (or that leads to a geographical or population expansion of) Burghfield or Mortimer will have a disproportionate and unwarranted effect on the smaller rural settlements that surround them.	by the Inspector to avoid the impression that there is any other focus. Policy ADPP6 provides more detail to ADPP1 in relation to the East Kennet Valley. It sets out in the final Housing bullet point the approach to be taken to housing development in the East Kennet Valley. Work on the Site Allocations and Delivery DPD will examine all aspects of the sustainability, including transport impacts, of the options under consideration.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	The SA/SEA does not make clear what level of housing above the RSS target was assessed - fails to assess all reasonable alternatives. Evidence of housing need is far in excess of the 11,000 dwellings assessed in the SA.	The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					the sustainability appraisal. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
Mr Hew Jones		Not specified	Not specified	Site allocations outside the settlement area of Burghfield should give preference to those that do not create planning precedence for the joining of independent villages adjacent to	Comment does not relate to the SA consultation, however Policy ADPP1 sets out the Spatial Strategy and Policy CS1 sets out the approach to delivering new homes. Most development will be within or

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				Burghfield. (i.e. the joining of Burghfield to Ufton Nervet through Sulhamstead). Preference should be given to those where access does not create overload or danger on roads	adjacent to settlements and related to the transport accessibility, their level of services and the availability of suitable sites for development, with the majority of development taking place on previously developed land. The number of dwellings proposed in the different spatial areas forms a basis for the allocation of sites in the Site Allocations and Delivery DPD, allowing for the allocation of suitable sites. Work on the Site Allocations and Delivery DPD will examine all aspects of the sustainability, including transport impacts, of the options under consideration.
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	No	The Sustainability Appraisal in respect of development of land at Tadley should be completely re-assessed in light of the evidence now submitted. Tadley should fall within the Rural Service Centre category. Given the restraints on development at Tadley arising from the nuclear issues, it is understandable that this location was not assessed further. However, that constraint has now disappeared and, given the sustainable merits of Tadley this should be reflected in the SA.	The potential strategic sites have been through various stages of appraisal throughout the development of the Core Strategy. Paragraph 4.4 of the Strategic Sites SA Policy Paper explains why the Silchester Road, Tadley site was eliminated from the consideration of strategic sites. The Settlement Hierarchy Topic Paper (2010) sets out the background research and evidence to support the development of the settlement hierarchy for the LDF. The consideration of proximity to Tadley was a consideration in the settlement hierarchy methodology; however Tadley is located outside the District boundary. The Boundary Hall decision (CD10/96) paragraph 403 clearly states *"This is a finely balanced case, with one very significant but unlikely harm to be set against a range of more 'conventional' planning considerations. However the consequences of such an unlikely event would be so serious that it is considered that planning permission should not be granted".* There is no need to re-assess the SA in

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					this regard. This was also debated at length at the hearing session on 27th June 2011.
Cllr Royce Longton		Not specified	Not specified	Under Community Infrastructure and Services, suggest that the sentence ends "..... and opportunities for a more distinct centre offering shops and services within the existing settlement of Burghfield Common will be explored."	The appropriate location for any centre will be explored in the Site Allocations and Delivery DPD.
Delivering New Homes and Retaining the Housing Stock (CS1)					
Mr Keith Carter		Yes	No	Statement that greenfield sites will need to be allocated should not include the AONB area. It does not comply with previous elements of the strategy which confirm that landscape priority will dictate whether developments are possible in the AONB.	The overall housing provision and that for the AONB was discussed at the hearings on 28 June 2011. In order to promote sustainable communities within the AONB and to meet local housing needs, some allocations of greenfield land will be required. The policy for the AONB is clear that any proposed provision is subject to the overarching objective for the AONB to conserve and enhance its special landscape qualities. The Inspector requested the change to CS1 to make clear that greenfield allocations would be required in each spatial area
Ms Liz Horne		Yes	No	There should not be any need for greenfield expansion within the AONB. There are large brownfield sites in the AONB at Compton and Hermitage which should be considered before any greenfield in the AONB, and should be mentioned in the strategy.	The overall housing provision and that for the AONB was discussed at the hearings on 28 June 2011. In order to promote sustainable communities within the AONB and to meet local housing needs, some allocations of greenfield land will be required. The policy for the AONB is clear that any proposed provision is subject to the overarching objective for the AONB to conserve and enhance its special landscape qualities. The Inspector requested the change to CS1 to make clear that greenfield

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					allocations would be required in each spatial area. The brownfield sites at Compton and Hermitage have been included within the Strategic Housing land Availability Assessment (SHLAA) and are included as "opportunity sites" within Policy ADPP5.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	The SA/SEA does not make clear what level of housing above the RSS target was assessed - fails to assess all reasonable alternatives. Evidence of housing need is far in excess of the 11,000 dwellings assessed in the SA.	The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with the sustainability appraisal. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional

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					Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	Paragraph 5.1a The SA/SEA does not make clear what level of housing above the RSS target was assessed - fails to assess all reasonable alternatives.	Response as above
Sandtrend Ltd		No	No	Submission on behalf of owner of site NEW064 (to the west of Donnington Village) that site should be classed as potentially developable along with NEW031 and NEW050 (the North Newbury site)	This site was not considered as a potential strategic site as it is on the western side of Donnington village, not immediately adjacent to the Newbury settlement boundary. It would be likely to have significant issues related to heritage assets - Donnington Castle, Conservation Area etc. and

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					impact on the setting of Donnington village.
Housing Distribution (CS2)					
Croudace Strategic Ltd	Boyer Planning Ltd	Yes	No	Thatcham should be allocated a higher proportion of housing than its current 900 units, on the basis of its status within the District and settlement hierarchy. It should have an appropriate / proportionate amount of housing allocated. The comparative populations of Newbury and Thatcham are 32,000 (22%) and 25,000 (17%) respectively (Settlement Hierarchy Topic Paper July 2010), out of a total of 144,000 in the District (2001 census data), yet Newbury is allocated 51% of the housing and Thatcham only 8.6%. The amended Sustainability Appraisal does not go back far enough to enable an objective reassessment of the strategic sites	The housing distribution was discussed at the hearings on 28 and 29 June 2011. The distribution was not based on a proportionate amount relative to population but on an analysis of the facilities, character and sustainability of the settlements in the District and on the assessment of potential sites within the SHLAA. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with the sustainability appraisal.
Newbury Racecourse Strategic Site Allocation (CCS3)					
David Wilson Homes		No	No	The policy and text have been updated to reflect the granting of planning permission. However, greater clarification needed in relations to reference to 'replacement' nursery (Policy CP3), and Paragraph 5.8b would benefit from a distinction between 'new' applications and 'reserved matters' applications pursuant to the outline still subject to the 30% affordable Housing requirement as per the outline consent.	The reference to new application is not intended to refer to the “reserved matters” pursuant to the outline permission, but to any completely new permission which might be granted in future if the current scheme was not implemented.

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Sandleford Strategic Site Allocation (CS4)					
Mr Les Cooper		No	No	Other more sustainable sites than Sandleford were eliminated. the LDF lists substantial reasons why Sandleford is unsuitable for large scale development all of which are conveniently ignored on the basis that the objectors' views were a common theme against all sites. Objections dismissed or downgraded subjectively. No ranking mechanism for education. AONB and Greenbelt downgraded. Treating land around the urban area as brownfield instead of greenfield allowed council to avoid the AONB objection. Right of way needs to be given due weight to the AONB objection. Should compare density of housing in the proposed area and its impact on neighbourhood amenities.	The SA/SEA process and its role in site selection are fully explained in the SA policy paper on Strategic Sites which was revised and published for consultation in November 2011. The Site Selection Framework used weighting in the scoring tables. This stage of the SA process was a starting point for considering sites, a strategic level assessment to provide an initial broad comparison of the proposed sites. They were not intended to be a detailed project level assessment. This assessment informed the Core Strategy at the “Options for the Future” stage, the preferred options document. Criteria were developed for the Site Selection Framework to assess the sites against the SA sub-objectives and a weighting attached to them. Limitations of this approach have been set out within the SA, such as the impact of site size and the distance from the midpoint to the boundary of the site upon some of the criteria and therefore the scores achievable. The site selection framework was therefore the starting point and it did not necessarily mean that the highest scoring sites would be taken forward. The commentary on the sites were key for taking them forward in conjunction with the rest of the technical evidence base and the outcomes of public consultation. The assessment proved useful in highlighting potential sustainability issues with potential sites and potential mitigation, infrastructure and development requirements should the sites progress further. The selection of sites progressed beyond the Site

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					Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The process therefore used the site selection framework scoring (with the weighting) and built on this to progress the potential sites through the process of the SA. Objections have not been dismissed or downgraded – responses to objections are set out in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14). Sandleford Park is neither Green Belt nor AONB. The Council's Education Department did rank the strategic sites in 2009, and this ranking has been published on the Council's website as part of the Examination Core Document library (CD09/46).
Mr. David Stubbs		No	No	SA in relation to Sandleford seems to have changed without justification and in contravention to the evidence. Earlier appraisals and inspectors decisions supported and required the use of the numerous other brownfield and infill sites around the town and wider West Berks.	The SA/SEA process and its role in site selection are fully explained in the SA policy paper on Strategic Sites which was revised and published for consultation in November 2011. The Site Selection Framework used weighting in the scoring tables. This stage of the SA process was a starting point for considering sites, a strategic level assessment to provide an initial broad comparison of the proposed

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				Earlier decisions in relation to identified hierarchy of land use should be adhered to before opening up greenfield sites.	sites. They were not intended to be a detailed project level assessment. This assessment informed the Core Strategy at the "Options for the Future" stage, the preferred options document. Criteria were developed for the Site Selection Framework to assess the sites against the SA sub-objectives and a weighting attached to them. Limitations of this approach have been set out within the SA, such as the impact of site size and the distance from the midpoint to the boundary of the site upon some of the criteria and therefore the scores achievable. The site selection framework was therefore the starting point and it did not necessarily mean that the highest scoring sites would be taken forward. The commentary on the sites were key for taking them forward in conjunction with the rest of the technical evidence base and the outcomes of public consultation. The assessment proved useful in highlighting potential sustainability issues with potential sites and potential mitigation, infrastructure and development requirements should the sites progress further. The selection of sites progressed beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The process therefore used the site selection framework scoring

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					(with the weighting) and built on this to progress the potential sites through the process of the SA. The site currently being promoted has been designed to address the previously identified concerns, with an overall masterplan to protect matters of importance. The draft masterplan is a Core Document (CD10/63), available on the Council's website. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.
Dr David Cooper		No	No	The SA calculates the walking distance to Newbury Town Centre from Newbury College instead of from the average for the site. The vertical height of the walking route should be factored in.	Both the North Newbury and Sandleford sites were measured from a recognisable point. Measuring from the midpoint of the Sandleford site would not reflect the proposed extent of the built development. It is not clear how gradient could be consistently factored into the SA/SEA.
Mr Adrian Clark		Yes	No	Negative impact upon traffic congestion and degradation of landscape likely by developing Sandleford. Large additional numbers of car journeys likely. Traffic infrastructure struggles to cope. Reduce the number of houses planned for	The traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy. These are published on the Council's website at

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				Sandleford to only the northern area bordering Monks Lane. Develop mixed use brownfield sites in Newbury town centre to compensate for the reduced housing.	http://www.westberks.gov.uk/index.aspx?articleid=16893. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions on 4th and 11th November 2010. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no

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					evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.
Ms Isobel Collyer		No	No	Alterations to the scoring system has never been explained to local residents, appear arbitrary and are mystifying to the electorate. With regard to Sandleford, assumptions about use of public transport seem to be wildly optimistic and not borne out by existing data. Distances appear to have been taken from the nearest site boundaries. Concern over traffic impact - e.g. Andover Rd and Monks Lane. Retail park specialises in items which require car use. Assumptions also made about need to protect employment land which are not consonant with the expressed views of local employers. Employment land should be released for housing and would result in less environmental damage. Surrounding wildlife by concrete is not likely to produce biodiversity. Questions 40% affordable housing figure on basis of WBC's track record.	In terms of 'alterations to the scoring system' please see response to Mr Les Cooper (above). Both the North Newbury and Sandleford sites were measured from a recognisable point. Measuring from the midpoint of the Sandleford site would not reflect the proposed extent of the built development. Transport Assessment Phase 4 (TA4) does not make any assumptions about future bus use. Therefore TA4 represents a worst case scenario and site specific public transport will provide a reduction in car trips. However, modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The protection of employment land stems from the Council's evidence base in the form of the Employment Land Assessment (ELA) which is available from the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=16712. The policy implications of the ELA and policy CS10 have been discussed at Examination hearing sessions. No evidence is provided by the respondent on the 'expressed views of local employers'. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA

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					has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. In terms of biodiversity, the biodiversity of the ancient woodland blocks were assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and ensures that they do not become isolated from each other. The HDA work demonstrates the improvement, enhancement and future management of the woodland and open space. 40% affordable housing will be delivered at Sandleford Park in accordance with emerging Core Strategy policy CS7.
Cllr Tony Vickers (West Berkshire Liberal Democrat Shadow		No	No	Several of the statements in revised Appx 8 appear to be wrong or selective, leading them to question the whole process by which the decision to include Sandleford Park has been made.	See Appendix E for detailed submission and officer response.

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Executive)				Lack of community involvement using the scoring system agreed by Members makes the Core Strategy non compliant in this respect. The revised SA/SEA fails to deal with these flaws and instead introduces spurious reasons for calling its choice sustainable, leading us to conclude that the process is unsound as well as non compliant in the process. Neither Sandleford nor North Newbury are needed at this time. The housing can be delivered from the Racecourse and a 'broad location' on the eastern periphery of the town centre. Will lead to legal challenges. Additional concerns over infrastructure deliverability and cost. This response also contains several appendices which are summarised and responded to in detail in an attachment to the Council's response.	
Mr Tony Hammond		No	No	Little evidence of community engagement. SA has been rescored without consultation. No strategic clarity as to the local generation of electricity which is set out in policy CS4. The sustainable travel link in Warren Road is unsound due to congestion and needing to take a right turn onto Andover Road. There are issues with the economic viability of the current bus link in Wash Common.	Responses to objections are set out in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14). The revised SA/SEA was published for consultation between 4 November and 16 December 2011. The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the

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				The local services which are listed as within walking distance of the Sandleford site will generally be visited by car. As the site is at the top of a hill in relation to Newbury Town Centre, cycle usage will be low. There is no mention of existing pollution issues, or the impact of the Racecourse and Sandleford sites on the overall transport plan in policy CS14. A major rebuild would be required for the Park House school. There is no description of how wildlife corridors would be integrated to ensure that the two woodland areas do not become isolated. Some baffling re-assessment in the rescoring of the SA, with a lack of additional detail about how the scores were changed. A credible SA should look at the practicalities of living in an area. The revised details have been used to justify a positive re-scoring and to confirm the previous decision to select Sandleford. The original scoring should stand and strategic site allocation should be considered in that light.	planning concepts for the sites. Under policy CS16, 10% of the site's energy will be required to be produced on-site. However, the Council may wish to negotiate a higher degree of renewable energy generation from this site. A detailed assessment has been carried out by the site's promoters which sets out the renewable energy options for this site (CD10/47). This shows that appropriate on-site renewable energy can be provided and further details of this will be set out during the masterplan SPD stage. Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. Effective infrastructure provision and traffic management measures will both play a role in managing pollution levels. In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement

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					for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. The masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and ensures that they do not become isolated from each other. Information about how the SA/SEA scorings have evolved are set out in full within the revised SA/SEA, and summarised in the response to Mr Cooper above.
Mr Philip Hawker		Yes	No	CS4 bullet point 6 refers to Appendix Ci in error. This should be amended to read Appendix cii.	Agreed. This is an error and needs to be corrected.
Mr Philip Hawker		Yes	No	Many concerns arising from the traffic impact of Sandleford Park are not addressed within the Transport Assessment Phase 4, e.g. Pinchington Lane/A339 roundabout. There is no credible comparison of the relative traffic impact of the Sandleford/North Newbury alternatives. The concentration of both	Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=1

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				strategic sites in South Newbury remains a worse alternative from a traffic congestion standpoint than North Newbury. The SA re-assessment contains errors of fact and highly misleading statements which is either due to ignorance or a desperation to save face by spurious justifications of a decision reached in error. Policy CS4 should be removed and replaced wither by North Newbury or by the serious consideration of mixed use developments on employment sites to the east of Newbury.	9636 The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions on 4th and 11th November 2010. The relative traffic impacts of Sandleford/North Newbury were assessed in Transport Assessment Phase 2 http://www.westberks.gov.uk/CHttpHandler.ashx?id=22606&p=0 which assessed the impact of strategic development at the 3 'reserve' sites in combination with Newbury Racecourse, setting out what mitigation would be required for each. The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available or why North Newbury would be a preferable choice. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.
Mr Tim Smith		No	No	The development site is not within easy reach of the town centre and people will choose to drive.	Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The town

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				The web based consultation package is extremely difficult to use and will put people off. 1,000 homes could be found by recycling empty office buildings and by a policy to encourage the re-use of flats above town centre shops. The shortfall should be sited in North Newbury which is a more sustainable solution than Sandleford.	centre of Newbury is not the only location that will be visited by residents from the proposed Sandleford site. However, public transport will be provided. It is an involved consultation but we have tried to make it as user-friendly as possible and have made it clear that the officers are happy to help anybody with the process of registering their comments. The Council's preferred method of receiving consultation responses is a web based system widely used by planning authorities. It is an efficient system that enables consultees to comment directly on the document, to retain a copy of their comment for their own records, to receive automatic acknowledgement of their comment and for comments to be efficiently analysed and made viewable on the consultation portal. Comments can also be submitted on paper forms which are readily available, or by e-mail. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the 1,000 homes could be situated. No evidence is given by the respondent about why North Newbury is a more sustainable solution than Sandleford.
Cllr Horace Mitchell		No	No	Supports BDBC response. No clear and effectively argued rationale for the selection of the Sandleford Park site. Alternative sites	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence

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				should be properly assessed against clear criteria. Continued support for the site appears to arise from officer opinion rather than a proper and balanced assessment. The site will make it unattractive for North Hampshire residents to use Newbury as their main centre due to traffic issues.	base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. Council Members have been involved in the process throughout and it is unclear why the respondent suggests that support for the site arises from 'officer opinion'. No information or evidence to support this comment has been provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636

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Mrs Diane Smith		No	No	The Council has failed to provide objective measures to justify why Sandleford's sustainability rating was adjusted. No evidence for statements about highways, education and facilities.	In terms of 'alterations to the scoring system' please see response to Mr Les Cooper (above). The full evidence base for the Core Strategy fully supports the statements made in the SA/SEA. The evidence base is all set out in Core Documents and the documents are publically available either in electronic copy from the Council's website or in hard copy from the set of Core Documents. The Core Documents list can be found at http://www.westberks.gov.uk/CHttpHandler.ashx?id=24862&p=0
St Gabriel's		Yes	No	The road infrastructure changes that will be required are not dealt with adequately. Improved access to other businesses including St Gabriel's will be required due to pressure caused by this development. Increased public access to the historic parkland is more likely to damage than preserve it. Retention of the historic parkland as countryside with managed access in the form of public footpaths linking areas such as Greenham Common and the Battlefield, with covenants preventing development in perpetuity would be a better way of preserving the historic landscape.	Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions on 4th and 11th November 2010. The proposal does not include any of the historic parkland. The areas adjacent are proposed to be protected from development in perpetuity. This is shown on the draft masterplan. The draft masterplan is a Core Document (CD10/63), available on the Council's website.

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Mr James Lewin		Yes	No	It is unclear why officers have favoured the Sandleford site. It has not been compared with the other reserve sites with a consistent, sound, evidence based methods. Insufficient weight was given to Sandleford's reliance on the A339 as the main access. Selection of Sandleford risks making central Newbury very difficult, time consuming and unattractive to access from the south, southeast and southwest. This may cause economic impacts as well as environmental. A site evaluation process should be carried out which gives weight to the topography of Newbury and its surrounding catchment and its accessibility for essential services and for the economic benefit of the town.	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The 3 reserve sites were assessed in the same way and were each assessed in combination with Newbury Racecourse. Paragraphs 10.6 to 11.18 specifically deal with the 3 reserve sites and set out the information on these site assessments which was previously included within Combined Strategic Housing Sites Appraisal Document Phase 2. Council Members have been involved in the process throughout and it is unclear why the respondent suggests that support for the site arises from 'officers favouring the site'. No information or evidence to support this comment has been provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636

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Mrs Kim Whysall-Hammond		No	No	The local community, including the Parish Council, have not been engaged in this plan. The re-scoring of the SA has been done without local consultation. The sustainable travel link in Warren Road is already congested and the exit onto the Andover Road is busy. This will cause delays to buses and people will use their cars. The services which are within walking distance will be visited by car. This will result in gridlock in South Newbury. Sandleford is at the top of a hill in relation to Newbury Town Centre which will make cycling unpopular. Newbury already has air quality issues. A major rebuild of the Park House school site would be required. No description of how wildlife corridors would be integrated into the development plan to ensure that areas do not become isolated and die out. Many of the re-assessments in the re-scoring are strange. This is not a credible SA. The infrastructure cannot cope with an extra 2000 people. The plans and policies have no credible solutions.	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). The revised SA/SEA was published for consultation between 4 November and 16 December 2011. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Effective infrastructure provision and traffic management measures will both play a role in managing pollution levels. The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions on 4th and 11th November 2010. The Council accepts that many people will wish to use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				The present scoring is a falsification and must be disregarded.	development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. In terms of biodiversity, the biodiversity of the ancient woodland blocks were assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and that they do not become isolated from each other. Suitable species passages will be provided. The HDA work demonstrates the improvement, enhancement and future management of the woodland and open space. Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above).
Mr Richard Aston		No	No	The selection of Sandleford Park is perverse and illogical. My living to the South of Newbury has resulted in many additional car journeys across Newbury which would not have been necessary if I had lived North of the centre. This leads me very much to the conclusion that the second strategic housing site should be in North Newbury. Any appraisal that dismissed the Eastern area due to unpopularity is ridiculous.	The relative traffic impacts of Sandleford/North Newbury were assessed in Transport Assessment Phase 2 http://www.westberks.gov.uk/CHttpHandler.ashx?id=22606&p=0 which assessed the impact of strategic development at the 3 'reserve' sites in combination with Newbury Racecourse, setting out what mitigation would be required for each. With regard to the Eastern area, public consultation forms part of the evidence base. However, there were wider reasons for why Whitehart Meadow and Pincents Hill were not taken forward as strategic sites and these reasons are set out in full in documents including Combined Strategic Housing Sites Appraisal Document Phases 1 and 2 and the revised SA/SEA specifically at paragraphs 7.3 to 8.5 and 11.19 to 11.30 of the document.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Ressance Limited		No	No	The selection of Sandleford appears to rely on a fundamental change to the scoring system, which has not been explained. The original scoring system resulted in a rejection of the site. Sandleford should not be preferred over PDL sites, such as exist in and around the town centre. The Council should examine a positive strategy of encouraging regeneration of old stock (of which there is plenty), empty.	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated
Mrs Carolyn Aston		No	No	Location of houses to the south of Newbury is illogical due to the location of most of the employment opportunities to the north and north-east. Empty offices and brownfield sites should be built on instead. Housing development should be on the Racecourse and the north side of Newbury.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. The Racecourse development has planning permission. Not all brownfield sites will be suitable locations for the provision of all types of development, for example family homes.
Mrs Rachel Page		No	No	The Core Strategy appears to be not legal and unsound. Consultation with local communities in South Newbury has been wholly inadequate.	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				Where is the plan and funding to show that appropriate infrastructure solutions are feasible to deal with the increased traffic levels? WBC have not made sufficient assessment of available and potential future brownfield sites. SA does not appear to have reassessed all the other sites but has focused on Sandleford. Concerned about the level of influence exerted by the Sandleford landowners and developers in WBC to result in this decision.	Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14). The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. The reassessment of sites has focused, following the Inspector's conclusions on this matter, on the choices to be made following Options for the Future, and therefore, in the Newbury/Thatcham area the reassessment has focused on the 3 sites of North Newbury, Sandleford Park and Siege Cross, all in combination with Newbury Racecourse which was a preferred strategic site by this stage. Whilst comments from site promoters have been received at each stage of the Core Strategy,

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					together with a significant level of evidence in support of their sites, 'level of influence' of developers has not influenced the site selection process. It is unclear why the respondent has this view – no evidence to support this comment has been provided.
Sutton Estates	RPS Group	No	No	Concern as to how Newbury Battlefield site came to be excluded from phase 1 of the combined sites document. The consultation documentation is difficult to follow and the paper trail is at best a distraction from the main issues. The content of the Combined Sites Phase 1 report and Appx 3 in the revised Strategic Sites Policy paper are different. Appx 3 adds little of substance that is now, and there is not an objective re-appraisal of reasonable alternatives. The contents of para 5.7 and 5.8 in the Strategic Sites Policy Paper describe fundamental shortcomings in the process of the consideration of alternatives that can only be corrected by re-considering all sites with potential and/or actual mitigation. Selecting one site based on mitigation whilst rejecting others is not sound nor legally compliant. The all eggs in one basket from one large scale strategic site maximises risk. Size was not previously used as a reason for site	The revision of the SA/SEA largely relates to how decisions were made following the Options for the Future stage. The original shortlisting of the sites is set out in full in Combined Strategic Housing Sites Appraisal Document Phase 1. For the purposes of completeness, this is now included as part of the revised SA/SEA report. Appendix 3 does not contain new information – but instead incorporates the contents of Combined Strategic Housing Sites Phase 1 into the revised SA/SEA document. Paras 5.7 and 5.8 cannot be read in isolation. The site selection framework scoring (with the weighting) was a starting point which was then built on to progress the potential sites through the process of the SA. The selection of sites progressed beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				selection. If the SA/SEA is to meet the requirements of the regulations, it must include a 'with mitigation' assessment of all relevant sites. Policy CS4 in the Core Strategy cannot be considered as sound or legally compliant in the context of the SA/SEA.	the process. The revised SA/SEA specifically sets out that the site selection process needs to consider the potential layout of development within the site and potential mitigation, and that it is one of the purposes of the SA/SEA to identify these factors. Clearly there are some factors which can be mitigated against and some which cannot, and this is described in Combined Strategic Housing Sites Appraisal Document phase 1. Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy. It is a detailed consultation but we have tried to make it as user-friendly as possible and have made it clear that officers are happy to help anybody with the process of registering their comments.
Rivar & Others	Carter Jonas	Yes	No	The strategic development opportunity	The site was originally assessed through Combined Strategic Housing Sites Appraisal Document Phase

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	LLP			promoted by Rivar at South East Newbury has not been accepted by the LPA for inclusion in the Core Strategy. The latest SA confirms Rivar's view that the rejection of this site was not soundly based. The site has not been considered by the LPA as a reasonable alternative. Advantages of the strategy include that it promotes the Newbury urban focus, contains further development within established landscape capacity; accessibility and avoiding over extending the town, restores underdeveloped land, secures a high quality network of green infrastructure and will be more effective in delivering new housing. Initial site selection was limited to 27 ha of the site, however Rivar are promoting 42 ha which has the potential to deliver a new neighbourhood. The negative aspects identified by the site selection framework are capable of being mitigated and this should have been taken into account as it was at Sandleford. The sites scored highly in the sites selection framework and are acceptable in terms of landscape sensitivity. The TA does not acknowledge the potential to extend existing bus services. An effective ecological mitigation/enhancement strategy could be designed as part of the masterplan.	1. Additional information was then provided and assessed following the Options for the Future consultation, but this did not change the original assessment of the site's suitability to form a strategic urban extension.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				If proper regard is given to the potential for mitigation, the SSA would not justify the rejection of this site. A reasonable alternative strategy of reducing the capacity of Sandleford in combination with Greenham to form an urban extension has not been properly assessed.	
Mr Richard Page		No	No	Process to select Sandleford as a strategic site is deeply flawed. The increase in scoring in Appendix 7 is highly questionable. Questions elements of the scoring in Appendix 7, specifically sub-objectives on housing; green infrastructure; improving access to the countryside; improving access to education; reducing the need to travel, especially by car; to conserve and enhance the biodiversity; to conserve and enhance the character of the landscape; to reduce air pollution; to reduce energy use and to reduce water consumption. The scoring has been retro-fitted to elevate Sandleford from a predominantly neutral site to one that is predominantly positive.	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites by site promoters. The scoring has not been 'retro-fitted' it has been reassessed taking into account all information available as set out above.
Newtown Parish Council		Yes	No	Newtown Parish Council supports the response provided by BDBC. There is still no clear and effectively argued rationale for the selection of the Sandleford Park site.	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process.
Mrs Sally Fish		Yes	No	Building on greenfield sites is not the answer when there are brownfield sites available. In combination with the Newbury Racecourse development there is too much development for south Newbury. Adding an additional 3,000 cars is unrealistic and will cause traffic grid lock. Nearby facilities involve crossing a busy road. Gradient is uphill on the way back from the town centre, meaning that most people will drive. Due to Park House's academy status there is no legal requirement for the school to expand, and as a sports college it is in no position to use up land for building extensions. The local community has not been consulted properly.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. Whilst Park House has become an academy, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty. The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14).
Ashmansworth Parish Council		No	No	Whilst Ashmansworth is in North Hampshire it is only 5 miles from Sandleford. Already the A343 at Park House School and Monks Lane get very congested causing long delays and	The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific

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				the retail park is usually grid locked at weekends. Newbury railway station gets busy and it is often impossible to park there. The Racecourse and Sandleford developments will generate lots of extra traffic and residents won't cycle or use buses. Express concerns about the limited consultation process which has ignored the concerns of parishes in Hampshire. Support BDBC's objection.	infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The local community have been consulted in full at each stage of the Core Strategy. As part of this, adjoining parishes which are outside of West Berkshire have been involved at each stage of the Core Strategy process. The details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14).
Miss Airlie Dyson		No	No	No reason has been given in the Core Strategy why Sandleford Park is the preferred strategic site. In May, Sandleford was on the reserve list. The SA should be made available at the same time as the Core Strategy. Changes have been made to it to justify the choice of Sandleford. The retail park is beyond the busy A339, not an easy walk or cycle. In order to walk or cycle at Greenham it may be necessary to drive there and back. The town centre is accessible	The revised SA/SEA sets out in full the process of site selection and details how Sandleford was selected as the preferred strategic site from the list of 3 reserve sites. The SA was developed alongside the Core Strategy and was available at the same time. The SA was published with the Draft Submission Core Strategy at Publication stage in February 2010 and submitted with the Core Strategy in July 2010 as this is a regulatory requirement. The SA Report is CD07/10 on the Core Documents List.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				only down a steep hill.	The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. Whilst the retail park is beyond the A339, there is a toucan crossing for pedestrians and cyclists.
Mrs Lisa Haynes		Not specified	No	The Core Strategy is unsound and unjustified. I feel I have had little time to participate. A basket of smaller sites spread across Newbury would be a viable alternative. A huge strategic site generates undesirable social and management issues. Green Infrastructure is extremely important. Chronic congestion and increased pollution will be unsustainable. Capability Brown landscape should be preserved in its entirety. Losing the greenfield setting of the classic	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14). Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				book Watership Down would reflect very badly on the town. The Core Strategy should be a vehicle for enlightened planning in the 21C; we do not want to become an identity visually illiterate place.	deliver wider community benefits and the vision and objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The proposal does not include any of the historic parkland. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The fictional route that the rabbits took in the book 'Watership Down' would be largely protected from development. There is evidence of a warren just below the rugby club which will also remain
Ian and Erica Campbell		Not specified	Not specified	Object to Sandleford proposal for 2 main reasons: 1. Concerned over Warren Rd access. Serious road safety issues bearing in mind proximity to	The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				schools. 2. Narrow section of the A343 north of Tydems needs to be widened.	on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Mrs S Toop		Not specified	Not specified	Opposed to over development of the Greenham/Wash Common area. This will completely spoil a very pleasant area and add to the prosperity of landowners/developers. There are houses for sale and other developments in the pipeline so no excuse for the development of Sandleford Park.	Objection noted. However, the allocation forms part of the 10,500 housing requirement for West Berkshire as a whole, and this is not negated by properties currently for sale.
Dr Peter Constable		Not specified	Not specified	The scale and site of development are inappropriate. The southern green approach to Newbury is an area of outstanding beauty and should be preserved. Need to avoid the reckless destruction of this site, and the Council should look at alternative options to redevelop inner urban brownfield sites.	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The southern approach to Newbury is not designated as an Area of Outstanding Natural Beauty. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land

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					which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. In terms of brownfield development, the Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.
Mr and Mrs Hancock		Not specified	Not specified	Newbury is a small town which cannot take more development. "Green Lungs" are badly needed on the outskirts. Traffic is already a problem. Planners should never agree to accept any further building except on brownfield sites. The Sandleford proposals affect the loss of an area of beauty, with an impact on local wildlife. The owners will make good money from selling the land, but do not live locally or consider local residents. The proposals that the exit / entrance is onto	The housing distribution was discussed at the hearings on 28 and 29 June 2011. The distribution was not based on a proportionate amount relative to population but on an analysis of the facilities, character and sustainability of the settlements in the District and on the assessment of potential sites within the SHLAA. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				Monks Lane is ridiculous. Traffic already queues along here, so how will new residents get to and from home. Monks Lane used to be a pleasant walk from Wash Commons, but not now, even out of rush hours.	situated. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. In terms of local wildlife, the biodiversity of the ancient woodland blocks were assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and that they do not become isolated from each other. Suitable species passages will be provided. The HDA work demonstrates the improvement,

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					enhancement and future management of the woodland and open space. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Ms Celia Read		Not specified	Not specified	Should not go from the 11th least favourable site to having it developed for 2,000 houses. No infrastructure, houses will need to be demolished and Monks Lane made a dual carriage way. Bypass was built to take the traffic out of Newbury, now it is being brought back. Should not be building on a green site, should build on brownfield - convert empty office blocks to flat and homes. No to Sandleford!	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). The TA work and the IDP have been discussed at the Hearing Sessions on 4 and 11 November 2010. In terms of brownfield development, the Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.
Susan Smith		Not specified	Not specified	Sandleford Park should be saved from development. If brownfield sites are available these should be utilised and with increased population these open spaces must be treasured ad retained.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					deliverability.
West Berks & Hampshire Joint Action Group		Not specified	Not specified	The public inquiry in 2000 condemned the Sandleford site. This is now being ignored. The revised SA arbitrarily alters the previous agreed rating process so Sandleford moves from 11th in sustainability to 2nd. This defies reasonable explanation. Other more suitable sites such as Dennison Barracks were rejected. Both sites near Thatcham were not considered. There are a number of mixed use sites which were not even considered. All existing infrastructure is overloaded in Newbury so new infrastructure will be required. North Newbury registers as more sustainable on any intelligent assessment. The already very congested and polluted A339 and Monks Lane will be further heavily impacted and it is impossible to see how mitigation could be effective. The concept of the public open space is deeply flawed. This is a Site of Special Landscape Interest which will be impractical if not impossible to protect and maintain. What protection will there be to stop the housing being extended southwards. It is hilly terrain and people will not use bikes and buses.	The scheme now being promoted at Sandleford differs substantively from the site which was previously put forward and has been designed from the outset to fully address the previous Inspector's concerns. The site would be developed in a comprehensive manner to ensure that the maximum potential can be derived with an overall masterplan to protect matters of importance. The full details of how the scheme has changed are set out in Combined Strategic Housing Sites Appraisal Document Phase 2, which is available on the Council's website at http://www.westberks.gov.uk/CHttpHandler.ashx?id=24270&p=0. Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). Dennison Barracks lies within Hermitage which is a service village in the District's settlement hierarchy. This means that it is expected to accommodate low levels of future development over the Core Strategy period. Both Thatcham sites have been fully assessed as part of the process of strategic site selection. This is explained in full within the revised SA/SEA. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific

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					infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The supporting text of policy CS4 confirms that "The formation of a Country Park or equivalent area of public open space in the southern part of the site will protect the sensitive landscape area in perpetuity". Substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan for the site.
Basingstoke & Deane Borough Council		Not specified	Not specified	Wish to raise concerns about the process of site selection (identification of Sandleford). The site was treated differently in comparison to	It is unclear why the respondent suggests that the Sandleford site has been treated differently to other reasonable alternatives. No information or evidence

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				other reasonable alternatives on the basis of a developer submission. Remains unclear as to why Sandleford Park is favoured, when initial site selection process scored Sandleford poorly. BDBC remains of the view that the site selection approach is unjustified and unclear. Concern on the impact of the proposed allocation remain.	to support this comment has been provided. The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. Where the development would result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636.
James Kay		Not specified	Not specified	This is not the best place to build 2000 houses. Roads are already overloaded. It is not sustainable. Each house is likely to own 2 cars and will use them to access Newbury Town Centre. Small sites in the middle and east of the town centre should be promoted instead, and walking and cycling promoted. Due to access to the A34/M4 junction it would be better to build on the centre or north sides of town.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. The outcome from the 4 phases of Transport

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				There is a lack of clarity in the process regarding ranking. The good people of Newbury deserve clarity and objectivity in this process.	Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above).
Mike Eaton		Not specified	Not specified	Concerned about the additional children to be absorbed into the existing schools (particularly at secondary level). Concerned about the environmental impact of building the new houses, the additional traffic creation and the destruction of a large area of the countryside.	In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development

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					timeframes and current Government policy. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The supporting text of policy CS4 confirms that "The formation of a Country Park or equivalent area of public open space in the southern part of the site will protect the sensitive landscape area in perpetuity". Substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as

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					a gateway to Newbury and retain the attractive open landscape to the south.
Julia Phillips		Not specified	Not specified	I cannot believe that this is the correct use of this land. I do not see that there is any proposal for new schools. Monks Lane is already full at peak times. Health Care is squeezed already without the addition of thousands of new patients. The Liberal Democrats have outlined available brownfield sites and these should be developed first. Developments should be spread around. The wildlife and woods and coppices together with the open fields are too valuable to be consumed by this proposal. The relaxation of the planning laws will give more power to local people.	In terms of education provision, a primary school is planned to be provided on the site and in terms of secondary education, Park House school is likely to be extended. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage the Council's Education Department do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. This information is set out in policy CS4 and in the Infrastructure Delivery Plan. Where the development would result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate

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					deliverability. No evidence is given by the respondent about where the homes could be situated. Substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The biodiversity of the ancient woodland blocks were assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and that they do not become isolated from each other. Suitable species passages will be provided. The HDA work demonstrates the improvement,

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					enhancement and future management of the woodland and open space.
Mrs Alison Sloan		No	No	The appraisal process has moved from a set of objective measures to a set of very subjective measures. Discounting the early scoring mechanism and shortlisting sites that did not score well has introduced a natural bias towards Sandleford. Other sites have not had the opportunity to present information to the same degree as the Sandleford site. In the east, Pincents Hill and Theale were deemed unsuitable due to local opposition. However Sandleford has created as much if not more opposition. Consultation on Sandleford was flawed as it was referred to as a reserve site and changed to a strategic site once the consultation had closed. Appendices 7 and 8 reveal a number of very subjective analysis. CS4 should be deleted and the council should re-appraise whether it needs a second strategic development site.	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). Public consultation forms one part of the evidence base. However, there were wider reasons for why Whitehart Meadow and Pincents Hill were not taken forward as strategic sites and these reasons are set out in full in documents including Combined Strategic Housing Sites Appraisal Document Phases 1 and 2 and the revised SA/SEA specifically at paragraphs 7.3 to 8.5 and 11.19 to 11.30 of the document. The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites by site promoters.
Mr Bryan Harper		No	No	The appraisal process has moved from a set of objective measures to a set of very subjective measures over time. A natural bias towards Sandleford has been introduced (10.8). Concerned that other sites have not had the opportunity to present information to the same degrees as the Sandleford site (5.8). Any one	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). Public consultation forms part of the evidence base. However, there were wider reasons for why Whitehart Meadow and Pincents Hill were not taken forward as strategic sites and these reasons are set

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				of these points could be a point of legal challenge. In the eastern area, sites were dismissed due to local opposition. However, Sandleford has created as much if not more opposition. The Council's consultation on Sandleford was by their own admittance flawed as it was referred to as a reserve site and then changed to a strategic site. An appraisal of Appendices 7 and 8 reveals a number of very subjective analysis. CS4 should be deleted and the Council should reappraise whether it needs a second strategic development site.	out in full in documents including Combined Strategic Housing Sites Appraisal Document Phases 1 and 2 and the revised SA/SEA specifically at paragraphs 7.3 to 8.5 and 11.19 to 11.30 of the document. The term 'reserve' site was changed in response to the consultation at the 'Options for the Future' stage. It became apparent that the term was causing some confusion (PTG minutes 3/10/09) about what was meant. This is summarised in the Strategic Sites Policy paper of the Revised SA/SEA report at para 11.16.
Ms Gabrielle McGarvey (Newbury Town Council)		No	No	Sandleford is counter to National Housing Policy. It is neither economically nor environmentally sustainable and will increase carbon emissions. It will build on a greenfield site of importance for its landscape value. It is a site of literary importance due to the book Watership Down. A significant amount of Newbury's housing needs could be catered for through sustainable town centre housing provision. As Regional plans are being revoked, we don't need to rush to implement strategies and identify sites for the amount of housing allocated under the RSS. The planning authority should look at what makes sense for Newbury. The Council's consultation was flawed as it referred to Sandleford as a reserve site only to	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. As far as the landscape is concerned, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It

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				change it to a strategic site once the consultation had closed.	is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. Planning remains a plan-led system and it is important that development is effectively managed. Without a plan, and if the Council's 5-year land supply dips, then it will become increasingly likely that there will be planning by appeal within the District. The saved policies of the Local Plan are out of date and it is important to get an up to date Core Strategy in place as soon as possible. The term 'reserve' site was changed in response to the consultation at the 'Options for the Future' stage. It became apparent that the term was causing some

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					confusion (PTG minutes 3/10/09) about what was meant. This is summarised in the Strategic Sites Policy paper of the Revised SA/SEA report at para 11.16.
Pat and Chris Webb		Not specified	Not specified	The thinking behind a second strategic site is fundamentally flawed and WBC should be looking for smaller sustainable sites in and around Newbury including empty office blocks and small industrial units. WBC should not be inviting developers to provide them with sites, but the Council should determine the best sites for ownership irrespective of ownership. The consultation process is fundamentally flawed as many people will not have been able to respond due to the complexity of it. People who do not own or understand computers could find the whole process overwhelming. The website was difficult to access and the font was too small. The previous term of reserve site may have given false assurance to people. Consultation deliberately held close to Christmas when everyone is so busy.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. The consultation began on 4 November and ran for 6 weeks which is a statutory period. Ending on 16 December it was deliberately organised to avoid being held over Christmas. It is a detailed consultation but we have tried to make it as user-friendly as possible and have made it clear that the officers are happy to help anybody with the process of registering their comments. The Council's preferred method of receiving consultation responses is a web based system widely used by planning authorities. It is an efficient system that enables consultees to comment directly on the document, to retain a copy of their comment for their own records, to receive automatic acknowledgement of their comment and for comments to be efficiently analysed and made viewable on the consultation portal. The consultation documents have been made available to view in hard copy at all of the District's libraries and at the Council Offices. Comments can

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					also be submitted on paper forms which are readily available, or by e-mail.
Greenham Parish Council		No	No	Specific reference is made in 11.36 to GPC making no comment at the Options Stage. However, although the GPC minutes don't say so, the presumption must be that is was not realised that reserve actually meant selected and strategic. The failure of GPC to comment was due to WBC's woolly and misleading definition. 2 large strategic sites lie in Greenham Parish which already has the largest proportion of affordable housing; however parish boundaries have not been taken into account. WBC must explain why and how it consulted on the basis of sites being termed reserve and then made strategic decisions on the basis of that consultation.	It is unclear what part of Options for the Future policy CS9 that GPC did not understand. The policy states that there were 3 options for 'the identification of a broad location for the future expansion of Newbury/Thatcham for up to 2,000 houses'. The term 'reserve' site was changed in response to the consultation at the 'Options for the Future' stage. It became apparent that the term was causing some confusion (PTG minutes 3/10/09) about what was meant. This is summarised in the Strategic Sites Policy paper of the Revised SA/SEA report at para 11.16.
Greenham Parish Council		No	No	It is claimed at 15.5 that a re-evaluation of the Sandleford site alters significantly the findings of the SA. However the scorings of the site have been enhanced significantly because the development will be in accordance with policy. Why doesn't Appendix 7 show a similar re-scoring for North Newbury?	The reassessment takes the previous SA as a starting point and reappraises both the North Newbury and the Sandleford sites on exactly the same basis where appropriate, taking account of the consultation responses and additional technical evidence, including all of the work carried out to develop the planning concepts for the sites by site promoters.
Mrs Sally Evans		Not specified	No	The many brownfield sites have not been fully appraised. Greenfield development should be a last resort. The SA claims that Sandleford presents the opportunity to walk, cycle and use	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				public transport to access facilities. This is not the case and the claim is flawed. The residents will in large part require cars to access facilities. Road planning will not solve this problem. There will be gridlock and pollution.	available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. The Council accepts that many people will wish to use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636.
Mr Terence Evans		Not specified	No	The many brownfield sites have not been fully appraised. Greenfield development should be a last resort. The SA claims that Sandleford presents the opportunity to walk, cycle and use public transport to access facilities. This is not the case and the claim is flawed. The residents will in large part require cars to access	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability.

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				facilities. Road planning will not solve this problem. There will be gridlock and pollution.	The Council accepts that many people will wish to use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Mr James Sinclair		Not specified	No	The many brownfield sites have not been fully appraised. Greenfield development should be a last resort. The SA claims that Sandleford presents the opportunity to walk, cycle and use public transport to access facilities. This is not the case and the claim is flawed. The residents will in large part require cars to access facilities. Road planning will not solve this problem. There will be gridlock and pollution.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. The Council accepts that many people will wish to

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				There are no jobs available in the area.	use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Mr Thomas Reid		Not specified	No	The many brownfield sites have not been fully appraised. Greenfield development should be a last resort. The SA claims that Sandleford presents the opportunity to walk, cycle and use public transport to access facilities. This is not the case and the claim is flawed. The residents will in large part require cars to access facilities. Road planning will not solve this problem. There will be gridlock and pollution. There are no jobs available in the area.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. The Council accepts that many people will wish to use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the

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					development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Mr Peter Norman (Say No to Sandleford)		No	No	The appraisal process for Sandleford has moved from a set of objective measures against which it is reasonable to attempt to score to a set of very subjective measures. Other sites have not had the opportunity to present information to the same degree as the Sandleford site. Any of these points could be a point for a legal challenge. Local opposition to Sandleford has not been taken into account in the same way that it was in the east. An appraisal of appendices 7 and 8 shows a number of very subjective analysis.	See Appendix F for response to full submission.

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				Detailed analysis and response attached as appendix.	
Kennet District Scouts		Not specified	Not specified	This is a positive response about the potential for Sandleford for potential scouts and guides who might move to the development.	Noted.
Mr Anthony Pick (Conservative Group, Newbury Town Council)	Councillor	Yes	Yes	Minority report due to the official response from NTC being exclusively written by the LibDem group who are in a majority of 13 to 12. 2 substantive failures of due process which have biased the likely outcome of any report that NTC writes. Firstly, feedback from public meeting likely to be biased as it was promoted and advertised jointly by the LibDem group and the Say No to Sandleford campaign. Secondly the group set up to write NTC's response was set up to consist of 2 Libdems and one Conservative. Generally agree that the present proposal to develop Sandleford is the best available solution and gives flexibility beyond 2026. Single site makes possible a well-planned and integrated development which can provide for a mixture of large and small dwellings and provide certainty that the land is available. The proposed layout has been carefully considered to minimise the effects on	General support for Sandleford noted. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this.

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				landscape character and historic environment and will preserve the ambience of the Grade II listed Sandleford Priory. Can be seen as an extension of the existing built environment. Sets out some concerns expressed at the public meeting - the need for a public meeting hall; concern over traffic generation; the proposed bus route; the exit point for the proposed business area and safe access to Greenham Common.	
Mr David Merchant		Not specified	No	The proposal to extend Park House School is flawed due to its academy status. Extending Park House would mean using existing sports areas which would be inappropriate for a Sports College, and would remove the cross country course. Queries the operation of the proposed bus system in Warren Road. Queries how the traffic will exit the site and join the A339 or Monks Lane as these roads are very busy and congested. Newbury does not have the infrastructure to deal with a 10% increase in population. The houses should be spread over brownfield sites. A site out of Newbury would be preferable for education and population, with purpose built	In terms of Academy status, whilst some schools, including Park House have become academies, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is

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				schools and other infrastructure. Traffic would be better at a site north of Newbury.	encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated.
Mrs Diana Merchant		Not specified	Not specified	Queries the future management of the ancient woodland. Queries how site rose from 11th to 2nd in the order for building. It may be needed for crops in the future. There are plenty of brownfield sites - better for social housing occupiers who do not have cars. Extending Park House would mean using existing sports areas which would be inappropriate for a Sports College. How will 4000 cars get out onto Monks Lane, this will cause grid lock. The grid lock going across the bridge will put people off coming to Newbury for business or shopping. Does not agree that the buses on Warren Road will work due to congestion etc.	In terms of the ancient woodland, the biodiversity of the ancient woodland blocks was assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and that they do not become isolated from each other. The HDA work demonstrates the improvement, enhancement and future management of the woodland and open space. Explanation of the evolution of the scoring system is

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				Queries the operation of the proposed bus system in Warren Road. The proposal to extend Park House School is flawed due to its academy status. Queries how the traffic will exit the site and join the A339 or Monks Lane as these roads are very busy and congested. Newbury does not have the infrastructure to deal with a 10% increase in population. The houses should be spread over brownfield sites. A site out of Newbury would be preferable for education and population, with purpose built schools and other infrastructure. Traffic would be better at a site north of Newbury.	set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. In terms of Academy status, whilst some schools, including Park House have become academies, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated.
Lisa Haynes		Not specified	Not specified	The Capability Brown landscape should be preserved for future generations. The impact of the loss of land from the book Watership Down would reflect very badly on Newbury. Green Infrastructure important. Walking distance to town taken from nearest point to the town, rather than the centre of the	As far as the landscape is concerned, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The proposal does not include any of the historic parkland. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				development.	retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The fictional route that the rabbits took in the book 'Watership Down' would be largely protected from development. The site was measured from a recognisable point. Measuring from the midpoint of the site would not reflect the proposed extent of the built development.
Cllr Jeff Beck		Not specified	Not specified	Any major new housing development in or near to Newbury is, in my opinion, best allocated to this strategic site for the reasons stated by the professional officers.	Noted.
Kennet District Scouts		Not specified	Not specified	If Sandleford goes ahead, could the developer build a hall with some adjacent land that could be used by both the Guides and Scouts, to be transferred into the ownership of the Scouting and Guide associations. Can provide further guidance on necessary amenities.	The provision of community facilities will be an important part of the next stages of planning the Sandleford site and will be looked at through the development brief process.
Mr David Peacock		Not specified	No	Once Newbury Racecourse earmarked for development no need for any other major housing site in the Newbury area. The figure of 2000 houses has not been adequately justified and no clear figure has been made available for the number of dwellings built/approved etc in the plan period. This reduces the necessary size of the	Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				Sandleford site. Greater weight needs to be given to alternatives. No serious consideration was given to finding a number of smaller sites. Converting empty office space would further reduce the required numbers. On a map the Sandleford site appears more sustainable than it is in reality. The gradient means that walking/cycling is unlikely; the road network is inadequate. The preservation of the pockets of woodland which form part of the site will not protect the wildlife using them once they are surrounded by houses. Parkway as an Academy controls its own admissions policy. Access to primary schools means some children crossing one of two major roads. At present there are no areas marked on the proposed plan for community facilities. Sandleford Park deserves full protection as a Capability Brown landscape. It is bizarre that no planning protection appears to exist for this landscape. The selection process which changed the ranking 'without justification or proper explanation' was flawed. the form of consultation was 'intimidating' and	objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. The outcome from the 4 phases of Transport Assessments shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 Public transport will be provided. Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be a Travel Plan prepared for the site. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				is via email only.	draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The biodiversity of the ancient woodland blocks were assessed both through an Ecology report undertaken by WYG (CD10/50) and in a Nature Conservation Management Strategy undertaken by HDA (CD10/62). In terms of buffer zones, the masterplan has been designed to ensure that there is a minimum 15m buffer between development and the ancient woodland which will enable informal paths to be formed to take the recreational pressure off the ancient woodland itself. The masterplan as set out also ensures that no properties back onto any of the areas of woodland and that they do not become isolated from each other. The HDA work demonstrates the improvement, enhancement and future management of the woodland and open space. In terms of Academy status, whilst some schools, including Park House have become academies, the Local Authority currently retains the responsibility for

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty. Community facilities will be assessed as part of the development brief process and are an important part of the next stage of the planning process. The proposal does not include any of the historic parkland. The areas adjacent are proposed to be protected from development in perpetuity. This is shown on the draft masterplan which is a Core Document (CD10/63) available on the Council's website. Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). It is a detailed consultation but we have tried to make it as user-friendly as possible and have made it clear that the officers are happy to help anybody with the process of registering their comments. The Council's preferred method of receiving consultation responses is a web based system widely used by planning authorities. It is an efficient system that enables consultees to comment directly on the document, to retain a copy of their comment for their own records, to receive automatic acknowledgement

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					of their comment and for comments to be efficiently analysed and made viewable on the consultation portal. The consultation documents have been made available to view in hard copy at all of the District's libraries and at the Council Offices. Comments can also be submitted on paper forms which are readily available, or by e-mail.
Croudace Strategic Ltd	Boyer Planning Ltd	Yes	No	It is not clear that Sandleford Park is overall the most sustainable option out of the potential strategic sites. A number of the potential strategic sites were discounted at an early stage and do not appear to have been revisited as part of this further work. Would support an increase of the housing figure to 11,700. The housing target for the AONB is too high. A greater proportion of the housing allocation should be directed towards Thatcham as a recognition of its status in the settlement hierarchy and relationship with Newbury in strategic terms.	The revision of the SA/SEA largely relates to how decisions were made following the Options for the Future stage. The original shortlisting of the sites is set out in full in Combined Strategic Housing Sites Appraisal Document Phase 1. For the purposes of completeness, this is now included as part of the revised SA/SEA report. The housing target for the AONB has been discussed through the Examination process, as was the role of Thatcham and the need for a period of consolidation. This is also documented within the revised SA/SEA report.
Mr Paul Day		No	No	The appraisal process for Sandleford has moved from a set of objective measures to a set of very subjective measures (appendix 8). Other sites have not had the opportunity to present information to the same degree as the Sandleford site and this could be a point of legal challenge. Public opposition was a reason for the dismissal of strategic sites in the east.	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites by

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				However Sandleford has created as much if not more opposition. The Council's consultation on Sandleford was flawed as they referred to it as a reserve site and then changed it once the consultation closed. An appraisal of appendices 7 and 8 reveals a number of very subjective analysis. CS4 should be deleted and the council should re-appraise whether it needs a second strategic development site and to re-appraise where best to site houses without regard to land banks acquired by developers.	site promoters. All site promoters have been able to submit information in response to Core Strategy consultations – it has been up to the site promoters how they seek to demonstrate the deliverability of their site. Public consultation forms part of the evidence base. However, there were wider reasons for why Whitehart Meadow and Pincents Hill were not taken forward as strategic sites and these reasons are set out in full in documents including Combined Strategic Housing Sites Appraisal Document Phases 1 and 2 and the revised SA/SEA specifically at paragraphs 7.3 to 8.5 and 11.19 to 11.30 of the document. Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Capital Corporation Projects Ltd	Bell Cornwell	No	No	Biased and inconsistent approach to site selection process, was incumbent upon Council to examine each of the sites on the same basis. Whitehart Meadow site, Theale scored highly in strategic site appraisal process and is suitable location for new development in the Eastern Urban Area. The Inspector should either find the Core Strategy unsound or he should recommend that in order for it to be found sound the Sandleford Park strategic allocation should be deleted.	All of the strategic sites were assessed on the same basis. These assessments are set out within Combined Strategic Housing Sites Appraisal Document Phase 1. For the purposes of completeness, this is now included as part of the revised SA/SEA report. Following the Options for the Future consultation, Whitehart Meadow was not taken forward as a strategic site. This is explained in Combined Strategic Housing Sites Appraisal Document Phase 2. For the purposes of completeness, this information is now included as part of the revised SA/SEA report (paragraphs 11.19 to 11.30).
Sandtrend Ltd		No	No	The LPA have altered the site selection process in such a way that the SHLAA material which has been fed into the SA has become unfair and inappropriately weighted in favour of Sandleford Park, particularly by comparison to a potential development site north of Newbury. The Sandleford Park site has, through the revision of the SA been considered with regard to a concept plan which alleviates concerns regarding the low rating of this site in the SA. However, the North Newbury sites have only been considered having regard to their overall areas of ownership and not based on the concept Masterplan submitted.	The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites by site promoters of both the North Newbury and the Sandleford sites.

Appendix A: Schedule of Comments on Submission Core Strategy in light of SA/SEA Report and the Council Response to the Comments

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
The Fairhurst Estate and JSF Accumulation and Maintenance Settlement Trust	Gerald Eve	No	No	Within the revised SA/SEA assessment, the Council has added more detail and reassessed the sustainability of a strategic site at Sandleford Park or North Newbury. The scoring methodology has now been altered and overall scores are not provided. Consider some of the commentary is in parts both factually incorrect and unbalanced. New masterplan provided and other appendices - response set out in full in Appendix G to responses.	See Appendix G for response to full submissions.
Mrs Karen Gillam		No	No	Appendix 8 revised SA. The sustainability criteria has changed and differs from the original scoring system that Councillors originally approved in 2009. This changes the ranking of Sandleford Park. Some of the statements do not reflect an accurate assessment of the criteria, therefore the scoring systems and assessments of Sandleford Park are not credible or justified. Would like to question whether the changes in the scoring system were put to Councillors formally and as a member of the public was not aware on the new plan advancing Sandleford Park. CS4 should be deleted.	Explanation of the evolution of the scoring system is set out in the SA/SEA in full and in summary in response to Mr Les Cooper (above). The evolution of the scoring system was discussed with Council Members, and this is described and explained in the revised SA/SEA report. The local community have been consulted in full at each stage of the Core Strategy. As part of this, adjoining parishes which are outside of West Berkshire have been involved at each stage of the Core Strategy process. The details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publically available from the Council's website (CD07/13 and CD07/14).
Sandleford Partnership	White Young Green	Yes	Yes	Consider that it is necessary to separate matters that go to the merits of the Sandleford	Noted.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				strategic allocation from those which relate to SA/SEA compliance. Based on Counsel's advice, with regards to the substance of the SA process, WYG is satisfied that the Council properly considered alternatives. The Inspector himself concluded that he was content with the SA. The revised SA has allowed the Council to set out the full quantitative and qualitative assessments related to allocating the strategic sites in the Core Strategy, and by setting this out in detail it helps the reader to better understand the process undertaken and clearly justifies the Council decision in identifying Sandleford Park as a strategic site. It is considered that the SA fully justified the inclusion of Sandleford Park within the Core Strategy as a strategic allocation and fully details why other alternatives were not considered appropriate. The SA/SEA is both legally compliant and sound, being fully justified, effective and consistent with national policy.	
A2 Housing Group & Angus Janaway	Barton Willmore	No	No	Council has not re-assessed all of the potential strategic allocations (or reasonable alternatives) and has not taken into account matters raised by the Inspector, including the potential that he will be concluding upon the Core Strategy in a changed policy and legislative context. The Council has removed all references to the RSS but has failed to take	The Council has not re-assessed all of the potential strategic allocations as the Inspector's finding was that the SA did not previously sufficiently explain the reasons for the selection of the Sandleford site from the alternative options at Newbury/Thatcham put forward in Options for the Future, nor for the selection of the broad locational approach in the Eastern Area. The Council did not therefore revisit

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				this into account within the SA / SEA. The Council should be re-assessing the reasonable alternatives on the same basis and failure to reassess the role that Thatcham should play within the overall provision of housing is considered to be unsound and does not meet the SA / SEA regulations. The Council's decision to eliminate the strategic sites at Thatcham was based upon the omission of any explicit reference within the RSS to Thatcham, instead referring to Newbury as a second tier hub. The Council has not re-assessed the sites put forward in the 'Options for the Future' consultation as requested by the Inspector and in fact has not even re-assessed the two Newbury sites, but merely re-appraised them. The Council has failed at all stages to consider the alternative sites on a level playing field. Whilst the Council acknowledge that they had been provided with information on a number of the sites, they have failed to consider whether it was possible for potential mitigation to impact upon all of the sustainable assessment scores. Consideration should have been given to asking each of the (11 sites) promoters for sufficient information to allow the sites to be considered consistently providing a fair and level basis for the further assessments. The LPA did not circulate the information submitted by the promoters to other departments within the Council, including the	assessments for sites which had been ruled out prior to the Options for the Future stage. The revised SA did take into account consultation responses, including those received since publication in February 2010. With regard to potential changes to policy and legislation, the Core Strategy still needs to be in general conformity with the SE Plan, as discussed as the hearings in June 2011. Though the references to the SE Plan have been removed in order to future-proof the document, the SE Plan principles of an urban focus and urban renaissance have been carried through into the spatial strategy. The Council's approach to the role of Thatcham was not based purely on the SE Plan policies. The approach to Thatcham is covered in Section 11 of the Revised Strategic Sites SA Topic Paper. Newbury has a much wider range of services and facilities and is the administrative centre of the District, whereas Thatcham has more limited services and facilities and has experienced high levels of growth in recent years. The 789 home Kennet Heath development was completed as recently as 2009/10. The approach to Thatcham was discussed during the Core Strategy hearings in June 2011. The Council does not accept that it has failed to consider the alternative sites on a level playing field. The site selection framework scoring (with the weighting) was a starting point which was then built on to progress the potential sites through the process of the SA. The selection of sites progressed

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				Education department, and as such did not request comments on the information submitted. At no point has this been considered and the re-appraisal of the SA / SEA has not taken it into account, resulting in the Education issues in Thatcham continuing to be used as a reason for not taking Thatcham forward as a potential location for strategic sites. Also failed to acknowledge the changes to the status of some Secondary Schools within West Berkshire which have recently been granted Academy status.	beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. In summary, The Council's approach to Thatcham was based on the role and function of the settlements, which was supported by the South East Plan approach but not dependant upon it. In terms of Academy status, whilst some schools, including Park House have become academies, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty.
Greenham Parish Council		Yes	No	SA Report non technical summary states that strategic site allocation was an unpopular option in the East. Unpopular with whom? How was the popularity measured and was the same test applied to other areas. Is it	Public consultation forms part of the evidence base and is taken into account alongside other considerations. However, there were wider reasons for why Whitehart Meadow and Pincents Hill were not taken forward as strategic sites and these

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				suggested that Sandleford was popular? Such a vague generalisation should be either justified or deleted.	reasons are set out in full in documents including Combined Strategic Housing Sites Appraisal Document Phases 1 and 2 and the revised SA/SEA specifically at paragraphs 7.3 to 8.5 and 11.19 to 11.30 of the document.
Greenham Parish Council		Yes	No	Why should the response from the Highways Agency (10.8) raise particular concerns about development at North Newbury due to the site's easy access to the Strategic Road Network and with jct 13 of the M4 and the A34? Is it preferable to build developments in areas where access to the strategic road network is difficult? This paragraph needs to be rewritten and the contents fully justified and explained.	The reason that it is stated that for North Newbury that the Highways Agency was particularly concerned was because this comment was made by the Highways Agency, who are a critical statutory consultee in the process.
Greenham Parish Council		Yes	No	Appendix 8 of the SA/SEA - the comparative tables for Racecourse/Sandleford v Racecourse/North Newbury differ only marginally and WBC is guilty of selective data inclusion. The wording with regard to green infrastructure illustrates that WBC was firmly wedded to Sandleford and was trying to justify it. How is the quality of the agricultural land identified - the Inspector previous recorded that land at Sandleford is very high grade agricultural land. Comparative AOD levels should be provided	The reassessment takes the previous SA as a starting point and reappraises where appropriate, taking account of the consultation responses and additional technical evidence, including work carried out to develop the planning concepts for the sites by the site promoters of both the North Newbury and the Sandleford sites. It is not clear what GPC mean regarding green infrastructure although substantive green infrastructure is proposed and this is shown in the draft masterplan. The quality of the agricultural land was identified on a consistent basis for all strategic sites using information from the Council's Geographical

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				(presume for North Newbury vs Sandleford although this is not clear from the response). North Newbury should be re-scored on the same basis as Sandleford. Both should be subject to an independent assessment of their agricultural worth.	Information System. Comparative AOD levels have not formed part of the assessment to date, as the impact of this would not be possible to qualify with any degree of accuracy.
Dr G Shillam		No	No	Housing development at Sandleford is not consistent with local or national sustainability criteria. Brownfield development is preferable to greenfield development. Brownfield sites are available within the current town boundaries.	The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated.
Mrs Mair Edwards		Not specified	Not specified	The consultation documents are complicated. The Sandleford proposal is fundamentally flawed, and will benefit only the landowners by way of profit from the sale of the land. The proposal will cause even more traffic misery, add to the poor quality of the air in Newbury, and overload existing schools. The proposal will damage the image of Newbury. There must be smaller sites to provide additional housing. Some of the villages around Newbury could be expanded - adding a few houses to each village would have far less	It is a detailed consultation but we have tried to make it as user-friendly as possible and have made it clear that the officers are happy to help anybody with the process of registering their comments. The Council's preferred method of receiving consultation responses is a web based system widely used by planning authorities. It is an efficient system that enables consultees to comment directly on the document, to retain a copy of their comment for their own records, to receive automatic acknowledgement of their comment and for comments to be efficiently analysed and made viewable on the consultation portal. The consultation documents have been made available to view in hard copy at all of the District's

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				of an impact on infrastructure schools and roads, and be more sustainable. Lack of advertising and discussion of the proposal. Seems to have been settled by the Council before residents have been made fully aware.	libraries and at the Council Offices. Comments can also be submitted on paper forms which are readily available, or by e-mail. The consultation was advertised as set in the Statement of Community Involvement (SCI). The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy.
Mr Graham Hunt (Newbury Town Council)		No	No	Newbury Town Council held a public meeting on 7/12/11 which was attended by over 300 residents. Their views have been taken into account in compiling this response.	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				The Town Council is seriously concerned about legal compliance regarding the legality of the process by which this policy was arrived at. The Strategic Sites policy paper contains statements that appear to be inconsistent with due process - e.g. paras 5.7 and 5.8. A strategic site of this size is not needed in the current Core Strategy period. Other options such as sustainable Town Centre provision have not been adequately considered. Policy CS4 should be deleted. The development at Sandleford is not economically sustainable. It is not environmentally sustainable. It will be built on a green field of importance both for its landscape (Capability Brown landscape) and for its importance to the local community (e.g. Watership Down book). It could be argued that for these reasons the site of also of national importance.	The statements are not 'inconsistent with due processes. The revised SA/SEA specifically sets out that the site selection process needs to consider the potential layout of development within the site and potential mitigation, and that it is one of the purposes of the SA/SEA to identify these factors. Clearly there are some factors which can be mitigated against and some which cannot, and these were taken into account in the site selection process, using all of the available information from the evidence base. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The information for all of the sites was taken into account on the same basis. Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available. Leaving such high numbers unallocated would mean not being able to demonstrate deliverability. No evidence is given by the respondent about where the homes could be situated. As far as the landscape is concerned, substantive green infrastructure is proposed and this is shown in the draft masterplan, which is a Core Document (CD10/63) and available on the Council's website. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The proposal does not include any of the historic parkland. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The fictional route that the rabbits took in the book 'Watership Down' would be largely protected from

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					development. There is evidence of a warren just below the rugby club which will also remain
Mr David Hill		Not specified	Not specified	I am emailing you to fully support the consultation responses made on behalf of many Wash Common residents by the Say No To Sandleford campaign group.	Noted.
Greenham Parish Council		Yes	No	The statements by the Education Dept in 10.7 of the SA/SEA are illogical and not understood. This contradicts comments made in the Site Selection Framework. WBC is referring to the maximum of 2000 dwellings in order to make North Newbury and Siege Cross less viable. The unbiased observer is left with the conclusion that either the Education Dept has bowed to some form of internal WBC pressure to slant its comments or the report authors have deliberately changed the Education comments to fit their needs. Additionally there is no reference to, or discussion about the effects of the granting of Academy status to various schools involved.	The statements made by the Education Department are as set out in their independent response to the 'Options for the Future Consultation'. These have been available to view on the Council's 'Objective' consultation system since 2009 and have not been modified in any way. In terms of numbers – each of the Siege Cross, North Newbury and Sandleford Park were assessed as having capacity to accommodate up to 2,000 dwellings and so were all considered on this basis. In terms of Academy status, whilst some schools, including Park House have become academies, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty.
Greenham Parish Council		No	No	It is stated at 11.10 that the site selection framework and the sustainability appraisal at	The revised SA/SEA specifically sets out that the site selection process needs to consider the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				options stage were based on the site areas promoted, the "red line boundary" of each site, without consideration of mitigation. However, we already know from 5.7 that Sandleford Park was only able to be considered because officers had already changed the rules, in respect of Sandleford only, to disregard the red line boundary and assume unquantified mitigation. Para 11.10 should be re-written and the contents fully justified and explained.	potential layout of development within the site and potential mitigation, and that it is one of the purposes of the SA/SEA to identify these factors. Clearly there are some factors which can be mitigated against and some which cannot, and these were taken into account in the site selection process, using all of the available information from the evidence base. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The information for all of the sites was taken into account on the same basis.
Mr Timothy Goldsack		Not specified	No	The appraisal methodology seems to be flawed, in that objectiveness has been severely compromised over time, introducing a bias towards the Sandleford development which was not present in the initial analysis. Delete section CS4 entirely. Does Newbury really need a "strategic development site"?	The reasons for the selection of the Sandleford site are set out in full within the revised SA/SEA which now incorporates the other parts of the evidence base which were previously separate documents. The Site Selection Framework assessments were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					service providers to inform the process. Work undertaken in the early preparation stages of the Core Strategy supported an urban focus and development on a combination of brownfield land, strategic urban extensions and smaller urban extensions. Allocating one extra strategic site means that there is long term certainty for developers, stakeholders and the District's community about the future direction of growth. This also enables the effective delivery of infrastructure and helps to deliver wider community benefits and the vision and objectives of the Core Strategy. Other non strategic sites will still be needed to meet the wider needs of the District and these will be allocated through the Site Allocations and Delivery DPD in accordance with the settlement hierarchy.
Julian Swift-Hook		No	No	Policy CS4 is not legally compliant. Decisions about the assessment of the site have been made without the formal approval by Members. This has given an unfair advantage to the promoters of the Sandleford site. See attached document. The consultation process has been difficult for residents to access, understand, and respond to. It has not been a meaningful consultation exercise. Soundness: There is no justification for policy CS4. The scoring criteria has changed, and the Sandleford site has moved from 11th to 2nd	The SA/SEA paper provides an account of the assessments undertaken and the decision making process which led to the proposed allocation of a strategic site at Sandleford. Throughout the process the assessments, along with background papers and reports have been taken to the Member Planning Task Group – see CD09/48A – and referred up through the Council's decision making committees at the appropriate stages. The consultation was advertised as set in the Statement of Community Involvement (SCI) and documents were made available in libraries throughout the District, at the Council Offices as well

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				preference after Newbury racecourse – with no proper oversight or scrutiny by Members and no adequate explanation for this. In addition, this strategic site is not needed. There are other appropriate options which have not been considered. Policy CS4 is not consistent with national policy. National policy dictates that development should be economically, environmentally, and socially sustainable. Development of the Sandleford site would not meet these three points, for example: no employment within the development, destruction of green fields (national policy notes that green areas that are of particular importance to the local community should be protected) and subsequent isolation of ancient woodland, increase in carbon emissions, the road network will be unable to cope with the increase in traffic, the site is of national importance (Capability Brown designed landscape, site referred to in the book 'Watership Down'). Amendments can be made to CS10, ADPP1 and ADPP2 to provide the housing needed through mix use residential led development.	on the Council's website. This has been a comprehensive consultation but we have tried to make the process as user-friendly as possible and have made it clear that officers are happy to help anybody with the process of registering their comments. Additional ways of responding included email and the paper forms, which are readily available. The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). The SA/SEA process and its role in site selection are fully explained in the SA policy paper on Strategic Sites which was revised and published for consultation in November 2011. The Site Selection Framework used weighting in the scoring tables. This stage of the SA process was a starting point for considering sites, a strategic level assessment to provide an initial broad comparison of the proposed sites. They were not intended to be a detailed project level assessment. This assessment informed the Core Strategy at the "Options for the Future" stage, the preferred options document. Criteria were developed for the Site Selection Framework to assess the sites against the SA sub-objectives and a weighting attached to them. Limitations of this approach have been set out within the SA, such as the impact of site size and the

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					distance from the midpoint to the boundary of the site upon some of the criteria and therefore the scores achievable. The site selection framework was therefore the starting point and not necessarily the highest scoring sites would be taken forward as the commentary were key for taking forward in considering the sites in conjunction with the rest of the technical evidence base and the outcomes of public consultation. The assessment proved useful in highlighting potential sustainability issues with potential sites and potential mitigation, infrastructure and development requirements should the sites progress further. The selection of sites progressed beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The process therefore used the site selection framework scoring (with the weighting) and built on this to progress the potential sites through the process of the SA. The Core Strategy has taken the availability of brownfield sites into account. The alternative approaches to meeting the housing requirement were considered in the 'Options for Delivering Homes' consultation in 2007/2008 where the preferred option emerged of a mix of strategic scale

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					sites, some smaller urban extensions and a continued emphasis on use of previously developed land. The SHLAA provides the evidence base for housing land availability. Policy CS4 does make provision for business development within the site as well as retail facilities. The traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy. These are published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=16893. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636. The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions in November 2010. In terms of the landscape, substantive green infrastructure is proposed and this is shown in the draft masterplan. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. This representation was accompanied with an attachment regarding an analysis of the *Strategic Sites SA/SEA Policy Paper: Update October 2011*. The Council response to this document is the same as that for the Say No To Sandleford attachment. See Appendix F.
Housing Type and Mix (CS5)					
Gladman Care Homes Ltd		Not specified	No	The evidence base for the Core Strategy should include: * West Berkshire Supporting People Strategy 2005-2010 * Supporting People Strategy Review 2008-2012 * Housing Strategy 2010-2015 * Putting People First 2011-2012 Refresh A new policy should be added to the Core Strategy to reflect the older person strategies already in place in order to plan for and delivered the required accommodation for	The evidence base does include some of these documents, including the Housing Strategy and the Supporting People Strategy which are listed in the Core Documents List. The policy is a broad, strategic policy which seeks to ensure that the housing needs of all sectors of the community, including the elderly, are considered. The policy does say that the housing mix should have regard to other relevant evidence sources. The supporting text (paragraph 5.12) states that '…developments should include the provision of lifetime homes. This will assist in the Council meeting the needs of an ageing population in the District (footnote – Positive Planning for an Ageing Society, The Berkshire Authorities response to Lifetime Homes, Lifetime Neighbourhoods'.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				older people.	
Infrastructure (CS6)					
Ressance Limited		Yes	No	IDP evidence published in the first Core Strategy consultation included a junction between Fleming Road and the A339 categorised as Critical to the Core Strategy and Low Risk of non-delivery. The junction has been deleted to comply with comments by the Inspector following the hearing. I have been unable to find any evidence to support this claim.	The Infrastructure Delivery Plan (IDP) has not yet been updated following the Inspector's comments (for the junction between Fleming Road and the A339 to be removed). The revised version, when published, will not include reference to the junction. Appendix Cii of the Core Strategy does not list the junction.
Affordable Housing (CS7)					
Cllr Tony Vickers (West Berkshire Liberal Democrat Shadow Executive)		Yes	No	The differential provision of affordable housing on brownfield and on greenfield land (30% and 40% respectively) is no longer justified by the relative economic viability of such sites, in the light of experience in the London Borough of Redbridge. Make the percentage of affordable housing to be delivered the same (40%) on brownfield land, from the time that CIL is adopted by the Council, which could be as early a 2013.	Policy CS7 reflects a range of viability issues which can be an influencing factor when developing previously developed sites, for example contamination issues. Each site should be taken on a case by case basis. The Council's Economic Viability Assessments 2007 and 2009 (CD09/17 & CD09/18) both show that a provision of 40% on previously developed land would not be viable across the whole District. Affordable housing is currently excluded from CIL and is proposed to remain part of S.106.
Ressance Limited		Yes	No	Evidence base is severely lacking. The imposition of Affordable Housing on developments of fewer than 15 dwellings will make small urban renewal projects unviable and therefore damage urban renewal, reduce	Policy CS7 is supported by Economic Viability Assessments 2007 & 2009 (CD09/17 & CD09/18) which examine how the development viability of market housing sites is impacted by a range of potential policy options for planning-led affordable housing. The 2007 study gives an indication of

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				housing provision and stifle development activity and thereby economic growth. It will prove commercially damaging to small developers. Furthermore, the price of land acquired prior to the adoption of the Core Strategy could not have factored in the dramatic impact of affordable housing. The threshold should remain at 15 units. The contribution from allocated sites, which produce massive land value uplift should be 50% or 60% to eliminate the need for contributions from small developments. There should be differentiation between green-field (where large uplift occurs) and urban renewal which requires the purchase and demolition of existing properties.	viability during buoyant housing markets and the update provides information of viability in poor housing market conditions to ensure a robust policy and the flexibility to respond to changing circumstances. The policy makes it clear that viability is key to delivery and negotiation on some sites may be necessary. The policy is sufficiently flexible to allow for this.
AWE Aldermaston and AWE Burghfield (CS9a)					
NAG		Not specified	Not specified	Support the inclusion of planning statement CS91 in the Core Strategy Sustainability appraisal on the grounds of public safety, and urge the Council to follow the ONR's advice on planning applications in the relevant DEPZs.	Comment noted.
Health & Safety Executive		Not specified	Not specified	HSE do not comment on individual Local Development Plans. LPAs are required by Reg 20 of the TCP Act to have regard for the objectives of Article 12.1 of the Seveso 11 directive in formulating their general policies in Part 1 of a unitary development plan.	The proposals map is already annotated with the Development Consultation Zones relating to CS9a

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				Objectives are: to prevent major accidents and limit consequences of such accidence for man and environment and the need to maintain appropriate distances between establishments and residential areas, public areas and areas of sensitivity or interest. HSE extranet system is available to all Planning Authorities. Any major hazard sites should be indicated to potential developers . Paragraphs attached (see Annex of attachment) could be used. In addition suggest that proposals maps are marked to show the location of any major hazard sites.	
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	No	WBC has consistently failed to look beyond its own borders. Tadley has good links with Basingstoke incidentally also one of the hubs identified in South East plan Policy WCBV1. What particularly needs to be borne in mind here is the very close proximity of the site to the large number of jobs at the AWE and also to others in Calleva Park. If the evidence of Dr Mike Thorne is accepted, development at Tadley will not in principle be constrained by HSE considerations and the AWE section of the SA Update note will accordingly now need to be completely reconsidered.	Any development proposal within the Inner Development Consultation Zones will be subject to consultation with the ONR. The ONR will monitor and adjust levels of acceptable development. The Council disagrees with this interpretation of the Boundary Hall decision notice, which the Council regards as site specific. The issue has been debated at length after the Boundary Hall decision was issued (CD10/96) at the examination on the 27th June 2011 In paragraph 403 of the Boundary Hall inquiry the Inspector did not agree with Dr Thorne's assessment of the risks involved. *"This is a finely balanced case, with one very significant but unlikely*

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				In the light of the new evidence now submitted we would request that the SA be rerun to properly assess the comparable merits of Silchester Road, Tadley as a suitable and sustainable strategic site.	*harm to be set against a range of more 'conventional' planning considerations. However the consequences of such an unlikely event would be so serious that it is considered that planning permission should not be granted".*
Employment and the Economy (CS10)					
Ressance Limited		Yes	No	The Council has misinterpreted the Employment Land Assessment in respect of the demand and need for B1 office accommodation. Vodafone's relocation resulted in about 52 premises coming to the market, several of which are still vacant. The average uptake value post Vodafone's relocation is far lower than the long term average (we estimate around 7,000sqm compared to the 13,429sqm used in the report). The effect of factoring this in dramatically reduces the amount of employment land required. The Council appears to have ignored the Consultants comments about B1a (office) being built at higher density than B1c and/or B2. The land use ratio is therefore far more efficient in the case of offices, especially in or close to town centres. HMG guidance on preparing/using ELA's cites town centre office densities of between 0.75 and 2, i.e. between twice and five times that relied on by Core Strategy. CS10: The Council's approach to denying alternative uses (para b) is overly prescriptive and at odds	Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy. These changes (FEPFC 19) to the policy provide sufficient flexibility to allow for employment generating non B class uses within Protected Employment Areas whilst ensuring the overall strategy is not compromised.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				with Government guidance (e.g. PPS4). London Road Industrial Estate is the subject of a strategic regeneration strategy. A mix of uses including retail, leisure and residential would be entirely appropriate. Furthermore, the land available in this location, if built out at reasonable density could deliver over 200,000sqm of office accommodation - this exceeds the worst case shortfall across the entire district (which we say is in any event inflated). Quite clearly the land will therefore be available for other uses. The statement "Proposals for such non B class employment generating uses which are likely to substantially prejudice the strategy set out at the start of this policy, will not be permitted." is prescriptive in the extreme as it could be interpreted to limit all re-development to B1, B2 and B8. Such a presumption appears to conflict with paragraph (c) in the policy wording and paragraph 5.45n in the subtext and is contrary to the NPPF and other sustainability and economic stimulation policies. Paragraph 5.45o requires alternative uses to compliment existing uses, which creates an impossible test for regeneration.	
Vodafone Ltd	Colliers International	No	No	The emerging NPPF continues to require sustainability appraisal to form an integrated part of the Council's plan preparation process. Policy CS10 is not legally compliant or sound given that the SA (as revised), does not appropriately consider the change in emphasis in national policy on the location of office	The SA would not be assessing the impact of the NPPF at this stage as no changes to policy CS10 were proposed as a result of the draft NPPF. The impact of NPPF on the Core Strategy was a separate consultation. The approach to offices as set out within Policy

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				development or the relaxation on the protection of employment land or floorspace, which is expressed in the draft NPPF. Policy CS10 and the explanatory text should be appropriately amended to reflect the NPPF: • Remove the requirement for the sequential approach to offices; • Ensure planning policy avoid the long term protection of land and floorspace; • Applications for alternative uses of designated land or buildings for employment purposes should be treated on their merits having regard to market signals and the need for different uses. Consequent changes will be required to Policy ADPP2 (4th bullet under Town centre). The Sustainability Appraisal should be reviewed in light of these changes.	CS10 has been debated at length at the hearings into the Core Strategy and the sequential approach was included at the request of the Inspector. As set out in 5.45o Protected Employment Areas have been designated through the Local Plan for B class uses to ensure sufficient sites are provided in suitable locations to foster business development and promote sustainable economic growth across the District. A review of these areas will take place as part of the Site Allocations and Delivery DPD. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Mr Hew Jones		Not specified	Not specified	Comment on appropriate location of business development (para. 5.45): In terms of Business Development, new retail development should not give cause to the potential elimination of current smaller retail outlets that are well supported and valued by the local community, nor require the addition of a significant number of houses close by in order to be sustainable.	Comments noted.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Town Centres (CS12)					
Vodafone Ltd	Colliers International	No	No	The emerging NPPF continues to require sustainability appraisal to form an integrated part of the Council's plan preparation process (Paragraph 34). As such, sustainability appraisal is to remain an iterative process and a combined part of plan preparation, which should inform the evaluation of alternatives and choices between options, including policy options. Policy CS12 is not legally compliant given that the Sustainability Appraisal (as revised), does not appropriately consider the change in emphasis in national policy on the location of office development, which is expressed in the draft NPPF. Policy CS12 should be appropriately amended to reflect that B1 offices are effectively not regarded as town centre type uses in the emerging NPPF, as follows: Town Centre uses identified by PPS4 (79) *in national planning policy* will be directed to the town and district centres defined in this policy. Accordingly, the Sustainability Appraisal should be reviewed in light of this change	The SA would not be assessing the impact of the NPPF at this stage as no changes to policy CS12 were proposed as a result of the draft NPPF. It would be unreasonable to expect the SA to reflect guidance which is in draft format.
Transport (CS14)					
Highways Agency		Not specified	Not specified	Policy CS14 has been reworded as requested by HA. Recommend rewording of the policy in paragraph 5.67 to say "Where a Transport Assessment for a significant development	Propose minor amendment to paragraph 5.67 as follows:

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
				illustrates that there will be a impact on the capacity of the SRN, the developer will need to undertake detailed traffic modelling in accordance with national guidance".	"Where a Transport Assessment for a significant development illustrates that there will be an ~~material reduction in capacity on~~ impact on the capacity of the SRN, the developer will need to undertake detailed traffic modelling in accordance with national guidance".
Green Infrastructure (CS19)					
Mr Graeme Panting		Not specified	No	Page 102: Sporting provision - not sufficiently comprehensive. i.e. badminton, table tennis, tennis.	Comment noted. No change proposed.
Historic Environment and Landscape Character (CS20)					
Mr Anthony Pick (Newbury Society)		Not specified	Not specified	Can a target for Local Listing across West Berkshire be included in the Monitoring Framework for CS20.	Comment noted. The Delivery and Monitoring section of the policy notes that the Council will deliver the policy through the SAD DPD and as a partner in the production of the HEAP. In this instance is therefore felt more appropriate to consider setting measurable targets for local listing through the SAD DPD process
Appendix A: Strategic Objectives					
BBOWT		Not specified	Not specified	Presence of ancient woodland within Sandleford site has been recognised, but it may have been useful to also highlight ancient woodland habitat represented by 8 Local Wildlife Sites within the boundary of Sandleford.	Comment noted. Issues dealing with habitat protection will be dealt with by a specific SPD or other supporting document to the Masterplan for the Sandleford site.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Appendix C: AWE Aldermaston and Burghfield					
Mr Hugh Dalgleish		Yes	No	This section has been removed, presumably as a consequence of the Boundary Hall appeal in Tadley. Basingstoke and Deane are making constraints on planning permission in areas within the DPEZ part of their core strategy and there is no good reason for WBC not to follow this example too. The only way WBC can be certain of properly discharging its various legal obligations with respect to the two AWE sites in planning terms, is to adopt a presumption against any large scale developments within the DEPZ, and for the HSE to be consulted as per the procedure from the Basingstoke and Deane report.	Appendix C has been deleted as a new policy CS9a: AWE Aldermaston and AWE Burghfield, covers the information previously contained in Appendix C
Appendix Cii: Critical Infrastructure Schedule of the Infrastructure Delivery Plan					
Dr David Cooper		No	No	No consideration is given to water supply infrastructure, specifically how sufficient water will be provided and pumped to top of Wash Common.	Infrastructure provision is dealt with in the Infrastructure Delivery Plan (IDP). The IDP is a living document which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. Houses will be built to current Building Regulations standards which incorporate water efficiency requirements.
Mrs Judith		No	No	There is no consideration of water supply and	Infrastructure provision is dealt with in the IDP. The

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Cooper				provision infrastructure, for a development which is taking place on raised ground and which will eventually comprise 2000 houses.	IDP is a living document which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. Houses will be built to current Building Regulations standards which incorporate water efficiency requirements.
Mrs Judith Cooper		No	No	The lack of provision for improved pedestrian facilities along Andover Road towards town centre renders this assessment unsound. In particular, the present pedestrian pavement is one side of the road (the far side from the Sandleford development) and narrow.	Infrastructure provision is dealt with in the IDP. The IDP is a living document (and will be updated periodically) which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. The masterplan for the site will also take infrastructure into consideration.
Mrs Judith Cooper		No	No	The document lacks any consideration of safe pedestrian access from the proposed park onto the A339, despite the fact that the nearest bus service towards Basingstoke will be reached this way, there is a Girl's school opposite the park entrance, and there is a public house in Newtown.	Infrastructure provision is dealt with in the IDP. The IDP is a living document (and will be updated periodically) which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. It will therefore be updated in light of changing circumstances. The masterplan for the site will also take infrastructure into consideration.
Mr Charles Brookes		No	No	The critical appraisal infrastructure is unsound because it says nothing about the supply of additional water to a significant development. After all, water supply in the SE England is already under severe strain.	Infrastructure provision is dealt with in the IDP. The IDP is a living document which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. Thames Water has a legal duty to connect houses to the mains water supply and water extraction has

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
					been discussed with Thames Water throughout the development of the Core Strategy and they have confirmed the sufficiency of the local water supply network. Houses will be built to current Building Regulations standards which incorporate water efficiency requirements.
David Wilson Homes		No	No	Reference made to IDP published in February 2010 prior to Racecourse being given permission. As a supporting document it has not been subject to consultation and so should carry limited weight. While the text has been updated to reflect the Racecourse getting permission the infrastructure list has not and makes reference to items that cannot be considered Critical or do not meet CIL regulation tests (e.g. Items that were only included in the S106 or reserved matters application and not considered vital to the granting of outline consent).	The IDP is a living document (and will be updated periodically) which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth.
Mrs Caroline Paus		No	No	No consideration has been given to drinking water supply and this is unsound, clearly 2000 houses on the top of a plateau houses will require water supply.	Infrastructure provision is dealt with in the IDP. The IDP is a living document which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. Water extraction has been discussed with Thames Water throughout the development of the Core Strategy and they have confirmed the sufficiency of the local water supply network. Houses will be built to current Building Regulations standards which incorporate water efficiency requirements.

Consultee	Agent	Legal	Sound	Consultee Comment	Council Response
Mrs Caroline Paus		No	No	Does not takes into account the pollution, vehicle movements and traffic congestion onto surrounding roads. The proposed bus service will not be adequate for working parents and school children attending secondary schools. There to be few local places available and pupils would have to travel to north Newbury	Infrastructure provision is dealt with in the IDP. The IDP is a living document (and will be updated periodically) which sets out the amount, cost, and funding of infrastructure necessary to support the delivery of growth. The masterplan for the site will also take infrastructure into consideration.

APPENDIX B

Further Examination Proposed Focused Changes (FEPFC) to the Submission Core Strategy

This table sets out a summary of each individual representation received in response to the consultation on the Further Examination Proposed Changes to the Submission Core Strategy. The table also sets out the officers' proposed recommendation as to how the Council should reply.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Schedule of Further Examination Proposed Focused Changes to the West Berkshire Core Strategy					
Dr G Shillam		No	No	The proposed changes are not legally compliant or sound, the latter on the basis that it is not justified, effective, or consistent with national policy. West Berkshire Council policy states: New homes should be primarily developed on suitable previously developed land within settlement boundaries. The proposed Sandleford allocation is on undeveloped land, outside current settlement boundaries. West Berkshire Council has not sufficiently taken into account mixed use development - mixing employment and residential development within the present town boundaries, and thereby ensuring maximum use of current resources. To overcome the issues, further	The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. At the Options for Delivering Homes consultation stage in 2007/08 the preferred option which emerged was for a combination of strategic and smaller urban extensions to meet the greenfield requirement. The Site Allocations and Delivery DPD will examine further the potential for re-allocation of protected employment areas.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				consideration of residential development on brownfield sites within the current town boundaries is required.	
The Theatres Trust		Not specified	Not specified	The Theatres Trust are very disappointed that concerns raised in April 2010 have not been included in any policy change. Access to leisure and culture can contribute significantly to overall quality of life and wellbeing. Creating new facilities and improving accessibility to existing facilities should be one of the key aims of Core Strategy policies so that the life of a theatre building can be extended for the benefit of future generations. Communities that are committed to providing opportunities for experiencing the arts are considered more liveable because they are attractive to businesses and industry and they offer a higher quality of life for residents. Tourism is strongly linked to art where arts activities are believed to stimulate residents and visitors, and vice versa. If a local authority does not have either an arts or a cultural strategy or equivalent, and because there are no national guidelines for the spatial plan to cover culture, then arts and culture can be simply missed out, which cannot be justified.	The Council recognises the contribution of leisure and culture to overall quality of life. Though there is no specific policy in the Core Strategy on cultural facilities, the Area Delivery Plan Policies contain sections on community infrastructure and services. ADPP2 for Newbury, for example, states that "existing community facilities will be protected, and where appropriate, enhanced. These include leisure and cultural facilities, which contribute to the attraction of the town for both residents and visitors." The Council also has a Cultural Plan (http://www.westberks.gov.uk/index.aspx?articleid=19782) which sets out clear aims and objectives for Cultural Services.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Mr Garth Simpson		Not specified	Not specified	Thatcham appears to have had specialist treatment because the Inspector stated that greenfield sites should be considered to meet the housing target. This is despite the fact that the Core Strategy states that the majority of development will take place on brownfield land. Easing settlement boundaries between Thatcham/Cold Ash and Shaw/Ashmore Green will have an impact upon infrastructure and transport infrastructure.	FEPFC13 to Policy CS1 states that greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas, so Thatcham has not had different treatment in this regard. Allocations of residential sites adjoining Thatcham or Cold Ash will be considered in the preparation of the Site Allocations and Delivery DPD which will involve local consultation and appraisal of alternatives taking on board extensive evidence, including that on infrastructure and landscape.
Basingstoke & Deane Borough Council		Not specified	Not specified	Concerns regarding the impact of the Sandleford Park allocation, namely the impact of the development upon the A339 in terms of congestion. This road is already heavily congested, and development at Sandleford Park would impact upon the residents of Basingstoke and Deane. Significant development due at Greenham Park (under app: 08/00348/comind), and Hampshire County Council plans to widen Knight's Bridge on the A339 (which crosses the River Enborne) from March 2012. While the work is undertaken, traffic will be reduced to a single lane with speed restrictions of 30 miles an hour. Drivers may use alternative routes further exacerbating congestion.	Transport impacts have been assessed in the Transport Assessment work and further work will be undertaken as part of the preparation of a masterplan for the development. The proposed development at Sandleford will not impact on the work on the A339 due to commence in March 2012 as housing construction will commence later than this.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Highways Agency		Not specified	Not specified	The core strategy, schedule of Further Examination Proposed Focused Changes (FEPFC) November 2011 does not cause any concern to the HA.	No response required
Further Examination Proposed Focused Change 2 (FEPFC 2)					
Strategic Objectives (Page 16)					
Hampshire County Council		No	Yes	Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339. More work is needed in relation to the transport infrastructure required for a major development at Sandleford. Such work should cover traffic mitigation measures connected with increased traffic on the A339, B4640, and other rural roads, including the identification of the measures necessary to improve accessibility by non-car transport modes. The Council does not sufficiently recognise the potential cross-boundary transport impacts, and this is demonstrated by the change of housing levels to say 'at least 10,500' dwellings. This allows for additional	Joint working has taken place with Hampshire County Council throughout the preparation of the Core Strategy, and this has been documented for the Core Strategy Examination. A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work. Infrastructure requirements are set out in the Infrastructure Delivery Plan and more detailed work will be carried out as part of the masterplanning of the site. HCC will continue to be a key stakeholder in any work that takes place to progress the Sandleford allocation and on any other relevant cross border issues. The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Any proposal for development would need to involve the necessary stakeholders and to recognise any cross-

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				development without ensuring that all the necessary stakeholders (including Hampshire County Council) are involved in considering the impacts arising from that.	border impacts.
Renewable UK		Not specified	Not specified	In RenewableUK's view this proposed change signifies a retraction from the proposed greater commitment - to exceed regional and national targets for carbon dioxide emissions reduction. Clearly, West Berkshire cannot exceed the national targets in isolation, and hence the suggested wording change may be a question of semantics. RenewableUK therefore suggests that the wording be amended to say "contribute as much as possible towards national targets...".	The change was suggested for clarity as West Berkshire cannot exceed national targets. The aim is to deliver growth in a way that helps to adapt to and mitigate the impacts of climate change. The wording “contribute as much as possible towards national targets” would be open to interpretation.
BBOWT		Not specified	Not specified	The Habitats Regulations Assessment (HRA) screening exercise was based upon the delivery of 10,500 dwellings. The change to the wording to allow more than 10,500 does not appear to have been tested in terms of the HRA (i.e. potential impacts upon the European protected sites). However, it is hard to see how a HRA could be applied when the number of houses to be delivered is open ended (e.g. the number of impacts on European sites may increase with higher numbers of dwellings). Using an open ended	The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Planning for long term housing provision cannot be exact but the Council does not feel it is appropriate to specify a ceiling. The housing requirement has not changed, and it is not felt necessary to re-visit the Habitats Regulations/Appropriate Assessment process until such time as the housing requirement is subject to a comprehensive review.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				dwelling figure could present problems in relation to the assessment of in combination effects when HRAs are undertaken by neighbouring authorities. To overcome these issues, either the original wording should be used, or any higher number of dwellings proposed should be tested through a Habitats Regulations / Appropriate Assessment process.	
Greenham Parish Council		No	Yes	The insertion of 'at least' and 'suitable' seem to serve no useful purpose other than to give un-Examined flexibility to build an unlimited number of houses on Greenfield land. These insertions should be removed.	The insertion of "at least" is to clarify that 10,500 homes is a minimum requirement rather than a ceiling to housing numbers and is an insertion that was requested by the Inspector. The word "suitable" has been added as the fact that land has been previously developed does not necessarily mean that it is a sustainable or viable location for housing development
Great Auclum Estate	Barton Willmore	No	Not specified	In addition to a minimum requirement, an upper target range figure should be included based on evidence presented considered through the examination. Such evidence includes the South East Plan, Government's 2008 based household projections, the Council's Strategic Housing Market Assessment, the Council's Economic Growth Forecasts, the Ministerial statement 'Planning for Growth'. No robust evidence has been presented to suggest that a higher level of housing provision is constrained by	The question of the housing requirement has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				existing infrastructure. WBC's approach to delivering growth in the Eastern part of the District is unsound. The spatial strategy should be expanded to reflect option 5 which allows for growth of the Eastern Area at Burghfield Common.	requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also involve a review of other critical elements of the evidence base. The Council does not agree that an upper "target range" figure should be provided. Any new requirement will need to be based on a comprehensive review of the evidence base. It is not felt necessary to change the spatial policies, for example that for the East Kennet Valley, to say "at least" 800 dwellings. Work on the Site Allocations and Delivery DPD will lead to more precise allocations to the spatial areas. The Eastern Area has been defined to reflect the relationship to Reading and the Council believes that Burghfield Common is more appropriately included in the East Kennet Valley spatial area.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Further Examination Proposed Focused Change 3 (FEPFC 3)					
Policy ADPP1 Spatial Strategy (Page 19)					
Hampshire County Council		No	Yes	Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339. More work is needed in relation to the transport infrastructure required for a major development at Sandleford. Such work should cover traffic mitigation measures connected with increased traffic on the A339, B4640, and other rural roads, including the identification of the measures necessary to improve accessibility by non-car transport modes. The Council does not sufficiently recognise the potential cross-boundary transport impacts, and this is demonstrated by the change of housing levels to say 'at least 10,500' dwellings. This allows for additional development without ensuring that all the	Joint working has taken place with Hampshire County Council throughout the preparation of the Core Strategy, and this has been documented for the Core Strategy Examination. A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work. Infrastructure requirements are set out in the Infrastructure Delivery Plan and more detailed work will be carried out as part of the masterplanning of the site. HCC will continue to be a key stakeholder in any work that takes place to progress the Sandleford allocation and on any other relevant cross border issues. The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Any proposal for development would need to involve the necessary stakeholders and to recognise any cross-border impacts.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				necessary stakeholders (including Hampshire County Council) are involved in considering the impacts arising from that.	
Streatley Preservation Action Group		Yes	Yes	The proposed changes are legally compliant and sound. However why state 'at least' 10,500 when just '10,500' could be used instead.	This addition was requested by the Inspector to clarify that 10,500 is not a cap on the level of acceptable housing development.
Croudace Strategic Ltd	Boyer Planning Ltd	No	Yes	The period for which the plan is relevant should be updated where referenced in all of the Policies and any supporting wording. Government advice states that the plan should cover 15 years from adoption (recognised in added para. 5.2a1), however in the light of the delays experienced in preparation of the plan, it currently only covers the next 14 years. The wording should be updated from 2026 to 2027 in all references and the housing target increased to take account of the additional year. Increasing the housing target by 1/15 equates to an additional 700 homes, which would increase the overall target to 11,200. We strongly support the addition of the wording “at least’ in front of “10,500 net additional dwellings” in para. 3.10 of the Strategic Objectives, in Area Delivery Plan Policy 1: Spatial Strategy, in Policy CS1. Our earlier representations (para. 3.5.3, Main	The Council has taken account of the effect of the delay in likely adoption date with the addition of FEPFC15, which proposes that the annual housing requirement be carried forward beyond 2026. Support for inclusion of ‘at least’ is noted. The word ‘approximately’ does provide some flexibility for more homes than stated. Work on the Site Allocations and Delivery DPD will lead to more precise allocations to the spatial areas. Support for inclusion of ‘suitable’ is noted.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				Matters 3 Statement, June 2011) promoted an increase of the 10,500 target to 11,000 homes over the plan period. We consider that this target should be increased to 11,200 as a minimum baseline figure in the Core Strategy. Notwithstanding the above support for the inclusion of 'at least' into the overall housing target policies, the wording of the Area Delivery Plan Policies for the Spatial Areas do not reflect the change in wording. The word 'approximately' in front of the number of houses an area should accommodate, for example in the Thatcham Policy (ADPP3) "Thatcham will accommodate approximately 900 homes of the total allocation for the District", does not provide sufficient flexibility to allow for more homes than stated. We also consider the insertion of the word 'suitable' to clarify the priority of developing brownfield land an appropriate addition to para. 3.10.	
Great Auclum Estate	Barton Willmore	No	Not specified	The Core Strategy should set out a higher housing figure or 'target range' than is currently presented within the document. The approach to delivering growth in the eastern part of the district is unsound in the context of the revised SA.	The Council does not agree that an upper "target range" figure should be provided. Any new requirement will need to be based on a comprehensive review of the evidence base. The Eastern Area has been defined to reflect the relationship to Reading and the Council believes that

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				The spatial strategy should be expanded to reflect option 5 (of the SA) which allows for growth of the Eastern Area at Burghfield Common.	Burghfield Common is more appropriately included in the East Kennet Valley spatial area.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	Whilst we welcome the proposed change to Policy 1, it does not go far enough to meet the clear level of need for market and affordable housing in West Berkshire, which far exceeds 10,500.	The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					a review of other critical elements of the evidence base.
A2 Housing Group & Angus Janaway	Barton Willmore	No	Yes	The inclusion of 'at least' 10,500 homes within Policy CS1 ensures it is explicit from the outset that the South East Plan target is not a cap or ceiling to the level of acceptable development, which is what the Inspector wanted made clear. Proposed revisions to policy CS1 supported because in order to achieve its housing numbers, there will be a need for Greenfield extension to the existing settlements. Council's approach to ADDP policies does not take account of the Inspector's comments in his July 2011 note in so far as they relate to Thatcham. The remaining ADPP policies all state approximate figures for housing over the plan period and we are concerned that this would not allow for higher numbers to be provided within the spatial areas and as such the policies do not conform with the overarching Policy CS1 in that they will not allow for the delivery of any more than 10,500 homes and the ADPP polices are therefore not considered to be justified or effective. The wording of the ADPP policies (with the exception of ADPP5) should be reworded to	Support for inclusion of 'at least' is noted' Support for revisions to Policy CS1 is noted. The word approximately does provide some flexibility for more homes than stated in the ADPP policies. Work on the Site Allocations and Delivery DPD will lead to more precise allocations to the spatial areas. The housing numbers in the ADP policies are not ceilings.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				make it clear that the caps are not ceilings to ensure consistency throughout the Core Strategy.	
Further Examination Proposed Focused Change 4 (FEPFC 4)					
Policy ADPP1 Spatial Strategy Explanatory Text (Page 19)					
Capital Corporation Projects Ltd	Bell Cornwell	Not specified	Not specified	Paragraph 4.11b: We welcome and support the proposed changes to Paragraph 4.11b, particularly the identification of Theale as a specific location for future development in the Eastern Urban Area.	Support noted.
Further Examination Proposed Focused Change 5 (FEPFC 5)					
Key Diagram (Page 21) / Figure 5: Eastern Area (Page 29) / Figure 7: East Kennet Valley (Page 36)					
North Wessex Downs AONB		No	Yes	The proposed change is legally compliant but unsound on the basis that it is not effective. Whilst the North Wessex Downs AONB Unit welcomes the Council's proposal to remove hatching from the AONB around Pangbourne and in the Eastern Area, neither the hatching in the Core Strategy or SA adequately reflect the findings of the Pincents Hill appeal decision (which concluded that the development of Pincents	The Council does not intend to amend the hatching in response to the decision on the Pincents Hill site. The potential within the broad location will be assessed in the Site Allocations and Delivery DPD and any appraisal of the site will take the appeal decision into account.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				Hill would harm the character of the area and the setting of the North Wessex Downs AONB over a significant area of viewpoints). The area of Pincents Hill outside of the AONB but within its setting should be removed from broad locations for development represented by hatching in Figure 5a of the Core Strategy. At the very least, the area of the rejected application near the M4/A4 junction behind the marked 'Pincents Lane Retail Park' and up to the AONB boundary should have the hatching deleted.	
W. Cumber and Sons	Savills	Yes	Yes	Support change to remove hatching from the AONB, including Pangbourne, with hatching to remain (on Eastern Area Broad Location for development) in the area outside the AONB. This ensures that the policy is justified and effective.	Support noted
Capital Corporation Projects Ltd	Bell Cornwell	Not specified	Not specified	Figure 2a/Figure 5: We support the proposed revisions to Figure 2a & Figure 5 in which the 'Eastern Area broad location for development' is more tightly defined to include the area to the east of Theale and west of the M4, whilst excluding Pangbourne and land in the AONB to the west of Tilehurst/Calcot.	Support noted

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Further Examination Proposed Focused Change 6 (FEPFC 6)					
Policy ADPP3 Thatcham (Page 26)					
Thatcham Flood Forum		No	Yes	The proposed change is unsound because it is not justified. The sentence commencing 'Greenfield sites adjoining the settlement' should be deleted because sufficient clarity on this point is provided in Policy CS1.	This change was requested, for consistency, by the Inspector. This point would not necessarily be covered in CS1 if all the greenfield development were allocated to Newbury (which is not the intention).
Parish Development Action Group Cold Ash Community Partnership		No	Yes	The proposed change is: a) Unnecessary: policy CS1 provides the overarching policy states that "Greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas...". ADPP3 does not therefore need this specific addition. b) Prescriptive: no evidence is presented as to why ADPP3 is the only area development plan policy requiring this specific guidance. Indeed Thatcham is only expected to find about 300 dwellings in a 14 year outlook. The gap is very small gap compared to other areas. c) Compromising site selection flexibility: there are only three sites adjoining the Thatcham settlement boundaries which are	This change was requested, for consistency, by the Inspector. This point would not necessarily be covered in CS1 if all the greenfield development were allocated to Newbury (which is not the intention).

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				classed as potential strategic sites / urban extensions. This change focuses the site allocations DPD too strongly on these sites. d) Provides unnecessary comfort to developers: Regarding strategic site 1 (North of Bowling Green Road): already this change has been published by Boyer to 2500 households as "agreed by WBC" and implying WBC approve of their planned 300 house development in Cold Ash. To facilitate soundness, the proposed focused change should be removed in its entirety. Policy CS1 provides the overarching policy for all ADPPs, and is sufficiently explicit about the development of greenfield sites adjoining settlements (see the 'Henwick Park' brochure/flyer.	
Cold Ash Parish Council		No	Yes	Core Strategy in general terms acceptable, and sustainability element sound in most instances. The use of greenfield sites, especially those adjoining settlement boundaries, is unnecessary given the quantity and quality of brownfield sites available to complete the minimum housing numbers . The Thatcham and Cold Ash gap will be reduced, and these are two very distinct areas.	This change was requested, for consistency, by the Inspector. The SHLAA has not identified sufficient sites to accommodate the requirement on previously developed land. Potential sites will be assessed during the preparation of the Site Allocations and Delivery DPD. It is not intended that large scale development take place adjacent to Cold Ash, which is a service village appropriate for only limited development.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				Concern greenfield sites north of Thatcham are now being identified when it was previously acknowledged by the Council that it was unsustainable. Nothing has changed to render these sites sustainable. Further large scale development is not required to meet the numbers allocated to 2026. Large scale development contrary to the Cold Ash and Ashmore Green Village Design Statement. Residual numbers could well be built on available brownfield sites in Thatcham. Selection of greenfield sites contradicts Section 4.11g of the revised SA/SEA (service villages will accommodate limited development), and Core Policies CS14 (minimise impact of all forms of travel) and CS17 (management of surface water will be insufficient to cope with major development). Concerns over infrastructure capacity, increase in the level of traffic (and subsequent damage to minor roads), and lack of public transport. Policy APP3 should be deleted.	
A2 Housing Group & Angus Janaway	Barton Willmore	No	Yes	The wording of policy ADPP3 should be amended to read that Thatcham will take an increased housing number to allow for a greater share of the Newbury / Thatcham	The approximate housing requirement for Thatcham was discussed at the hearings on 29 June 2011 and the Council has explained its reasoning behind a lower allocation for Thatcham, which has seen substantial

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				residual requirement. This is of particular importance in relation to Thatcham given its location within the district settlement hierarchy and the unconstrained nature of the majority of the land surrounding the existing settlement boundary. The present wording of the policy does not take this in to account, nor does it conform with policy CS1 or the overall strategy.	growth in recent years, than for Newbury. There is no intention to undermine the role of Thatcham and there is no conflict with the aims of the Core Strategy. Thatcham is included in the urban area level of the hierarchy but that does not imply that it should have a higher housing requirement. Newbury not only has a much greater range of facilities and services but also much higher potential, identified through the SHLAA, for use of previously developed sites.
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	The following additional wording proposed for Area Delivery Plan Policy 3: Thatcham; "and will include greenfield sites adjoining the settlement" is strongly supported by Croudace Strategic Limited. The Council stated at the EiP in June 2011 that it was intended that the housing target for Thatcham was partially met by greenfield sites, however this was not made clear in the previous version of the Submission Core Strategy. The inclusion of this wording provides clarification and comfort regarding the acceptability in principle of future development on greenfield sites at Thatcham in order to help meet local housing need. In accordance with recognised sustainability principles, we agree that the site or sites should be adjoining the settlement.	Support noted.
Further Examination Proposed Focused Change 7 (FEPFC 7)					

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Policy ADPP4 Eastern Area (Page 28)					
W. Cumber and Sons	Savills	No	Yes	The proposed changes introduce unnecessary restrictions which will create uncertainty for development proposals within the broad location adjacent to Theale. Infrastructure improvements can be secured through a Section 106 Agreement as part of specific planning applications. Clauses within the Section 106 can be inserted to ensure that infrastructure requirements are implemented within a specific time frame. The final sentence of the proposed change (which starts 'Theale would need to undergo...') is likely to lead to confusion about the Council's approach to development, create ambiguity, and act as a tool to resist development. No robust justification is provided for this approach, and the flexibility of the Core Strategy is undermined as the 'period' referred to is not defined. This sentence should be deleted.	The housing requirement and distribution in the Eastern Area was discussed at the hearing on 29 June 2011.Though the potential phasing of any development is not defined, the reason for paragraph 4.8 is to make clear that, with a large commitment already, any further development of some scale in Theale, would need to be programmed to be delivered in the latter part of the plan period.
Greenham Parish Council		No	Yes	No justification for the statement that Theale needs a period of consolidation (for the 350 new homes) to provide for facilities and services to be upgraded whereas south Newbury is expected to absorb 2000 dwellings. For parity, Greenham and South Newbury should equally undergo a period of	The Sandleford development is regarded as an urban extension to Newbury. Newbury and Theale are very different settlements in terms of facilities and services. Sandleford is programmed to deliver housing in the latter half of the plan period; what paragraph 4.28 is saying is that with a relatively large commitment already, any further development of some scale in Theale would also

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				consolidation, to provide an opportunity for facilities and services to be upgraded, after the completion of the Racecourse development before any building commences at Sandleford or alternatively Theale should be open to potential development in the same way as every other settlement in the District.	be need to be programmed to be delivered in the latter part of the plan period.
Further Examination Proposed Focused Change 8 (FEPFC 8)					
Spatial Policy SP4 (Page 30)					
Capital Corporation Projects Ltd	Bell Cornwell	Not specified	Not specified	We welcome the changes to ADP Policy 4, with the exception of the reduction in the housing target from approximately 1500 to 1400, which we do not believe is justified given the acknowledged need for the Eastern Urban Area to take account of the need and demand for housing in this area generated by its close proximity to Reading. The other changes to ADP Policy 4 are supported, particularly: a) the deletion of the previous reference to the delivery of the approved housing development at Lakeside, Theale, which is by no means certain; and b) the changes that reflect the revisions to the 'Eastern Area broad location for development' in Figure 2a and Figure 5.	The reduction of the housing target from 1500 to 1400 is not a FEPFC for consultation. This change has already been discussed at the hearings on 29 June 2011. The reduction was a result of the decision to exclude Pangbourne from the Eastern Area. Support for changes to ADPP4 noted.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Further Examination Proposed Focused Change 9 (FEPFC 9)					
Policy ADPP5 North Wessex Downs Area of Outstanding Natural Beauty (Page 33)					
Mr D W Bending		Yes	Yes	The proposed change is sound. Streatley and Basildon Parish Councils have both considered section 9 regarding growth in the AONB and both strongly support the wording now proposed since it strengthens the previous wording, which was itself consulted on and approved, as regards conservation and enhancement of the special landscape qualities of the AONB. The caveat about adjustment of the numbers where necessary seems to both Councils to be fully justified.	Support noted.
Pangbourne Parish Council		Yes	Yes	The further examination proposed focused changes are both legally compliant and sound.	Support noted.
Greenham Parish Council		No	Yes	The proposed wording would allow the Council to allocate any shortfall within the AONB to anywhere within the District. This could be done irrespective of the size of the shortfall, or the location to which the shortfall is allocated and would countermand the	The proposed wording has been included to clarify that the overarching objective for the AONB is the conservation and enhancement of its special landscape qualities. If work on the Site Allocations and Delivery DPD indicates that a lower housing target than 2,000 is more appropriate for the AONB in order to adhere to the

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				principles on which the CS is based. The proposed text should be expanded by adding at the end ....'but within the same geographic area' or similar.	landscape priority of the policy, allocations outside the AONB would need to be made in order to conform to Policy CS1. Any such allocations would be related to the settlement hierarchy outlined in CS1 and would be in conformity with the relevant ADP Policy. The housing figures in the ADP policies are approximate at the strategic level of the Core Strategy – the Site Allocations DPD will be prepared in conformity with the Core Strategy but will provide more detail on the housing distribution based on the more detailed work required for site allocations for housing.
Gerald Palmer Eling Trust	West Waddy ADP	No	Not specified	The previous wording of ADPP5 should be returned to. The change to the policy provides an absolute maximum figure for housing provision and no minimum so the Council would accord with this policy if it did not grant planning permission for any further housing development. Furthermore once the 2,000 limit had been reached the policy would be breached every time a further development was approved, even where it was in a highly sustainable location without an adverse impact on the landscape of the AONB, including much needed affordable housing provision on rural exception sites. A policy that not only severely limits the amount of development, but additionally puts a cap on it, has no in-built flexibility.	The Council's proposed wording is not intended to put a cap on development in the way outlined in this representation. The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan if 2,000 homes had already been delivered. Though no minimum number is set out in the policy it clearly states the objective of appropriate and sustainable growth, set within the limitations of the overarching objective to conserve and enhance the special landscape qualities.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
North Wessex Downs AONB		No	Yes	North Wessex Downs AONB Unit is strongly opposed to the proposed new wording, and it reverts to the policy that led to the suspension of the Inquiry in November 2010. It is vague and unenforceable prioritising conservation and enhancement which the council should be observing in any case. There are no grounds for allowing a further 600 dwellings in the AONB. The overarching housing objective for the AONB should be to meet identified local housing needs, not 'appropriate and sustainable growth that conserves and enhances it special landscape qualities'. 'Sustainable growth' is not the purpose of AONBs. The future of Dennison Barracks and the Compton Institute of Animal Health has not yet been decided. Whether or not these are intensively developed for housing has a significant impact on the gap which would then remain between our proposal for 1400 dwellings and the Inspector's 2000 dwellings. ADPP5 should be amended so the AONB housing figure is amended to a realistic 1400, with any additional housing being restricted to Hermitage and Compton brownfield sites, and rural affordable exception sites.	The housing provision for the AONB was discussed at the hearings on 28 June 2011. The change that has been introduced here has been made to emphasise that provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. The consultee believes that the yardstick of adhering to the landscape priority is too vague and a matter of interpretation, providing no reliable basis for adjudicating between proposals. The Council does not accept this and believes that landscape analysis will be critical in assessment of sites for allocation in the Site Allocations and Delivery DPD. The Council therefore considers that the proposed ADPP5 which incorporates the FIPFC (or FEPFC9) makes it clear how the policy should be applied. If it would be helpful however, for further clarification, the Housing sub section bullet point 2 could be amended to read: 'There will be further opportunities for infill development and for development on previously developed land. New housing allocations will be focused on the Rural Service Centres and Service Villages within the North Wessex Downs, with the emphasis on meeting identified local needs. The development will be allocated through the Site Allocations and Delivery DPD or a subsequent planning document, and will depend on the role and function that the settlement performs, supported by suitable development opportunities, identified through the SHLAA. The conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing these sites.'

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					The Council contends that a policy constraining market housing, as suggested by the consultee, would not meet the Council's objectives, set out in various policy statements, to foster sustainable rural communities. Market housing is an important means of providing for affordable housing to meet local needs and of supporting local services and facilities. There is still uncertainty over the future of Dennison Barracks. An SPD for the Compton Institute of Animal Health site is in preparation but the housing proposals are not yet developed and there is further public consultation to undertake. Development on these sites will be included in the overall number for the AONB. The position with regard to completions and commitments within the AONB at March 2011 is that 788 additional homes have been delivered since 2006 and permission remains for a further 447 (See LDF Annual Monitoring Report 2011). The suggestion to limit numbers to 1,400 would therefore only leave an additional 165 dwellings to be permitted and delivered over the next 15 years. This level of provision would be equivalent to approximately 40 dwellings per annum in the AONB for the period 2011- 26, only 26% of the average annual delivery in the period 2006 – 2011.
Streatley Preservation Action Group		Yes	Yes	Sound and legally compliant. AONB - Maximum of 2,000 is right policy.	Support noted. The Council's proposed wording is different from that proposed by the Inspector, in that it is designed to provide an element of flexibility in

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					development management terms. The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan period if 2,000 homes had already been delivered.
Natural England		Not specified	Not specified	We are concerned that whilst in theory this policy will prevent an adverse impact on the AONB from the remaining additional new housing developments it may be unimplementable or/and cause difficulties for development management in practice. The difficulties will be exacerbated if the time between adoption of this policy, and delivery of the site allocation DPD assessment is prolonged. It is unclear what proportion of the allocation will be captured in the Site Allocations and Delivery DPD. The difficulty of sound implementation will be further exacerbated in the absence of more detailed guidance on what "appropriate and sustainable growth that conserves and enhances its special landscape qualities", means in practice. The issue of how development outside the AONB, but may still affect the AONB has not been addressed.	The change has been made to emphasise that provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. However, the consultee believes that the policy may be unable to be implemented. The Council does not accept this and believes that landscape analysis will be critical in assessment of sites for allocation in the Site Allocations and Delivery DPD. The Council therefore considers that the proposed ADPP5 which incorporates the FIPFC (or FEPFC9) makes it clear how the policy should be applied. If it would be helpful however, for further clarification, the Housing sub section bullet point 2 could be amended to read: 'There will be further opportunities for infill development and for development on previously developed land. New housing allocations will be focused on the Rural Service Centres and Service Villages within the North Wessex Downs, with the emphasis on meeting identified local needs. The development will be allocated through the Site Allocations and Delivery DPD or a subsequent planning document, and will depend on the role and function that the settlement performs, supported by suitable development opportunities, identified through the SHLAA. The conservation and enhancement of the natural beauty

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				The rationale for adopting Further Examination Proposed Focused Change 9 (FEPFC9) over Further Inspector Proposed Focused Change 1 (FIPFC1) appears reasonable, and should give clearer protection to the AONB.	of the landscape will be the paramount consideration in assessing these sites.' The Council intends to progress the Site Allocations and Delivery DPD as soon as possible following the adoption of the Core Strategy. Until housing allocations are made through the SAD DPD, the policies in the West Berkshire District Local Plan will continue to apply, with housing development outside of existing settlement boundaries being contrary to adopted policy and consequently likely to be refused. Policy ADPP5 (Environment sub section bullet points 1 and 2) gives more detail about what is meant by 'appropriate and sustainable growth'. The Policy also needs to be read in conjunction with other policies in the Core Strategy such as ADPP1, CS1, CS20 and national guidance. The Council believes that the Core Strategy, particularly Policy CS20, together with national guidance contained in PPS7, the AONB Management Plan and other associated documents, contain sufficient guidance to consider development proposals located outside the AONB but which could potentially impact upon it. Preference for FEPFC9 over FIPFC1 noted.
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	We support the Inspector's proposed wording for the changes to the first bullet point of the ADPP5. Notwithstanding this, we	The housing provision for the AONB was discussed at the hearings on 28 June 2011. The change that has been introduced here has been made to emphasise that

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				still consider (as set out in detail in Section 5.1 of our representations to Main Matters 3 Statement, June 2011) that the figure of up to 2,000 dwellings to be provided in the AONB is too high a target for this nationally protected area. In the update to the SA/SEA, the Council notes that the North Wessex Downs AONB is a significant constraint in the eastern part of the District adjacent to Reading. Housing development in this protected area should be on a small scale, infill basis and should respond to the needs of the local communities whilst conforming to PPS7. We consider it inappropriate to allocate a specific number of dwellings to this area, and instead promote the re-allocation of housing numbers to the main urban areas.	provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. Given the objective of promoting sustainable communities in both urban and rural areas of the District the Council feels that some guidance on the potential scale of development in the AONB should be contained in the Core Strategy.
Further Examination Proposed Focused Change 10 (FEPFC 10)					
Policy ADPP6 The East Kennet Valley (Page 37)					
Mrs Rebbecca Keen		No	Yes	The change from 'a' to 'the' implies that all development will be focused in Burghfield and Mortimer. I think it is unnecessary to limit development to a specific area – i.e. Burghfield and Mortimer, when ideally	The change in wording was not meant to imply that all development would be focused in Mortimer and Burghfield Common, but these are the rural service centres which are the most sustainable settlements in the East Kennet Valley spatial area. This change was

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				developers should make use of all suitable and available sites across the area. I oppose this change in wording.	requested by the Inspector to avoid the impression that there is any other focus.
Further Examination Proposed Focused Change 11 (FEPFC 11)					
Policy CS1 Delivering New Homes and Retaining the Housing Stock and Explanatory Text (Page 39)					
Hampshire County Council		No	Yes	Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339. More work is needed in relation to the transport infrastructure required for a major development at Sandleford. Such work should cover traffic mitigation measures connected with increased traffic on the A339, B4640, and other rural roads, including the identification of the measures necessary to improve accessibility by non-car transport modes. The Council does not sufficiently recognise the potential cross-boundary transport impacts, and this is demonstrated by the change of housing levels to say 'at least 10,500' dwellings. This allows for additional development without ensuring that all the necessary stakeholders (including	Joint working has taken place with Hampshire County Council throughout the preparation of the Core Strategy, and this has been documented for the Core Strategy Examination. A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work. Infrastructure requirements are set out in the Infrastructure Delivery Plan and more detailed work will be carried out as part of the masterplanning of the site. HCC will continue to be a key stakeholder in any work that takes place to progress the Sandleford allocation and on any other relevant cross border issues. The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Any proposal for development would need to involve the necessary stakeholders and to recognise any cross-border impacts.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				Hampshire County Council) are involved in considering the impacts arising from that.	
Greenham Parish Council		No	Yes	As with FEPFC2, GPC mistrusts the inclusion of the words 'at least' without any limiting text. GPC does not agree that WBC can 'phase and manage' delivery, unless it is intending to become a house builder itself. The scale and speed of house building is entirely a matter for the commercial judgement of the developer. This FEPFC needs to be re-worded to ensure that it is sensible and achievable.	The insertion of "at least" is to clarify that 10,500 homes is a minimum requirement rather than a ceiling to housing numbers and is an insertion that was requested by the Inspector. Though WBC is not a house builder, the allocation and release of land is managed through the development plan and development management processes. The Council has a responsibility to monitor the housing land supply, to demonstrate that future housing requirements can be met and to plan for development together with associated infrastructure.
Great Auclum Estate	Barton Willmore	No	Not specified	The Core Strategy should go further than is currently proposed with regard to the housing target being proposed. The Core Strategy should also provide an upper 'target range' figure which reflects the evidence considered in the examination. WBC's approach to delivering growth in the Eastern part of the District is unsound. The spatial strategy should be expanded to reflect option 5 which allows for growth of the Eastern Area at Burghfield Common.	The question of the housing requirement has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also involve a review of other critical elements of the evidence base. The Council does not agree that an upper "target range" figure should be provided. Any new requirement will need to be based on a comprehensive review of the evidence base. The Eastern Area has been defined to reflect the relationship to Reading and the Council believes that Burghfield Common is more appropriately included in the East Kennet Valley spatial area.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	Proposed change to at least 10,500 net additional dwellings does not go far enough to meet the clear level of need for market and affordable housing in West Berkshire.	The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
Capital Corporation Projects Ltd	Bell Cornwell	Not specified	Not specified	We welcome and support the introduction of 'at least' in the introduction to the policy, [and at Paragraph 5.1a] confirming that the overall housing target is a floor not a ceiling.	Support noted
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	In addition to supporting the inclusion of 'at least' in the policy wording in relation to the housing target figure, we also support the additional wording relating to an evidence-based review of housing numbers.	Support noted.
Further Examination Proposed Focused Change 12 (FEPFC 12)					
Policy CS1 Delivering New Homes and Retaining the Housing Stock and Explanatory Text (Page 39)					

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	An up-to-date evidence base, including evidence on market and affordable need, is required as a matter of urgency, before the Core Strategy is adopted. Both PPS3 and the draft NPPF highlight the importance of LPAs using an up-to-date evidence base to inform their strategies. To delay the updating of West Berkshire's evidence now, will therefore only lead to the need for an early review of the Core Strategy, and presumption in favour of development, once the final NPPF is published, which is anticipated for spring 2012.	The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	Support the additional wording relating to an evidence-based review of housing numbers. There should also be a mechanism within the policy to update the housing numbers following the review. As set out in our earlier representations (para. 3.5.5, Main Matters 3 Statement, June 2011), we consider that a review every 5 years would be an appropriate timescale.	Support noted.
Further Examination Proposed Focused Change 13 (FEPFC 13)					
Policy CS1 Delivering New Homes and Retaining the Housing Stock and Explanatory Text (Page 39)					

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Mrs Elaine Hare, Thatcham Town Council		No	Yes	The changes are unsound because they are not justified. The major development of any new site on greenfield land is not required anywhere in the District given that there are brownfield sites to accommodate the housing numbers where sites need to be defined at this stage. This would include the re-categorising as mixed use (including substantial amounts of housing) of some sites that are presently reserved for employment use only. Siege Cross is not a specified site within the plan and that this Council agrees with the Core Strategy which specifically acknowledges that Thatcham cannot take further large scale housing developments within the plan period.	The evidence throughout the preparation of the Core Strategy is that greenfield sites will be required to deliver the housing requirement. The continued designation of protected employment areas will be addressed in the Site Allocations and Delivery DPD as set out in Policy CS10, but the Council also needs to ensure that sufficient employment sites are provided in the right locations to foster economic growth. Not only is there insufficient brownfield land to deliver the number of homes required but mixed employment/residential sites would be unlikely to deliver the required mix of housing, including meeting the need for family homes.
W. Cumber and Sons	Savills	No	Yes	Support the insertion of the sentence "greenfield sites will need to be allocated...". FEPFC13 should be reiterated in the ADPP policies. This will ensure that the Core Strategy is consistent and addresses the Inspectors comments in his note dated July 2011 which have regard to the need for greenfield extensions adjoining the main settlements.	Support noted. It is not felt necessary to re-iterate the requirement for greenfield land in the spatial policies, as the requirement is set out in CS1.
Capital Corporation	Bell Cornwell	Not specified	Not specified	We welcome and support the acknowledgement that greenfield sites will	Support noted

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Projects Ltd				need to be allocated in all four spatial areas in order to accommodate the required housing and that all settlement boundaries will be reviewed as part of the site allocation process.	
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	We welcome the addition of wording to include the need for greenfield site allocations. In particular we support the Council's acknowledgement that these should be adjoining settlements, as stated in the additional wording. However, that part of the sentence regarding spatial areas is unclear, as the revised wording states that "Greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas" [our underlining]. This should be amended to clarify that it is Thatcham within the Newbury/Thatcham spatial area in which greenfield sites will be allocated. Although an earlier paragraph of the Strategy - para. 4.9; Delivering the Spatial Policies – considers Newbury and Thatcham together as one spatial area (one of the 4 spatial areas identified within the plan), the towns have separate area policies. It is only within the Policy for Thatcham (ADDP1) in which reference to a need for greenfield sites is made. We therefore consider that this should be made clear within Policy CS1. This will ensure that Policy CS1 is consistent with the other policies in the plan, namely ADPP1,	Support noted. The Council believes that the spatial policies are clear and consistent in this regard. Both the Newbury and Thatcham policies state that greenfield land will be required and Policy CS1 makes it clear that greenfield land is needed in each spatial area.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				ADPP2 and ADPP3.	
Further Examination Proposed Focused Change 15 (FEPFC 15)					
Policy CS1 Delivering New Homes and Retaining the Housing Stock and Explanatory Text (Page 39)					
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	West Berkshire have amended Core Strategy Policy 1 to " at least 10,500 net additional dwellings" and claim that this enables the housing target to be exceeded both annually and post the 2026 period. However, this is somewhat contradicted by the proposed supporting text in paragraph 5.2a1 which states that " pending any review of housing numbers, an annual average net additional dwelling requirement of 525 dwellings per annum will be carried forward post 2026 ". We suggest that paragraph 5.2a1 is contradictory to the aims of Core Strategy Policy 1 and should therefore be removed.	The average annual requirement over the plan period is 525 dwellings per annum. Policy CS1 seeks to ensure that this minimum requirement is met. There is no contradiction in carrying over this requirement, pending any review, to the period post 2026, in order that a 15 year supply can be demonstrated.
Further Examination Proposed Focused Change 16 (FEPFC 16)					
Policy CS6 Infrastructure Requirements and Delivery (Page 37)					
Thames Water		Not specified	Not specified	Appendix Cii should state that the list is not exhaustive. As exact details of phasing and	This issue has been raised by Thames Water in previous consultations (Options for the Future: West Berkshire

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Property				development locations evolve, so will the water and sewage infrastructure needs of the development. Thames Water also suggest some additional wording to be added to policy CS6 and its supporting text as follows: To comply with PPS12 and the South East Plan either the Infrastructure Policy needs to be amended to specifically refer to water and sewerage infrastructure or there should be a new policy dealing with water and sewerage infrastructure along the lines of: Proposed addition to Infrastructure Policy or text for new Water/Waste Water Infrastructure Policy The Council will..... Take account of the capacity of existing off-site water and sewerage./waste water treatment infrastructure and the impact of development proposals on them. Where necessary, the Council will seek improvements to water and/or sewerage/waste water treatment infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development.	Core Strategy, Examination Proposed Focused Changes). The Council has consistently responded by stating that additional detail will be covered in the Infrastructure Delivery Plan (IDP). The IDP is a 'live' document (and will thus be updated regularly, and in conjunction with the preparation of the Sites Allocations and Delivery DPD), and it identifies the amount, cost, and sources of funding needed to support the growth proposed in the Core Strategy. It is prepared in conjunction with infrastructure providers.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				The development or expansion of water supply or sewerage/waste water treatment facilities, including sewage sludge, will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised. Text along the following lines should be added to the Core Strategy to support the above proposed Policy : "PROPOSED NEW POLICY SUPPORTING TEXT - The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no	

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."	
Further Examination Proposed Focused Change 18 (FEPFC 18)					
Policy CS9a AWE Aldermaston and AWE Burghfield and Explanatory Text (Page 69) **Appendix C AWE Aldermaston and AWE Burghfield (Page 126)**					
Aldermaston Parish Council		Not specified	Not specified	Policy should reflect that each case should be treated on an individual basis taking into account the planning balance between 'extremely remote' risk and the benefits of a specific development. There should be no blanket ban on small developments that would meet local needs. The restriction in the first sentence should apply to all DEPZ zones. If the ONR advises against a development in the Middle or Outer Zone, then they too should be refused permission by the Council, and this should be clearly stated. The final paragraph of the explanatory text should be applied to all three DEPZ Zones, and not just the Inner Zone. With regard to the fourth sentence, the Council should	The Council believes that the wording of the policy CS9a and the explanatory text is clear and unambiguous and reflects the unique circumstances that exist at AWE Aldermaston and Burghfield. As drafted the policy does not impose a blanket ban on development as is made clear by sub note 63. This issue was extensively discussed after the Boundary Hall decision was issued (CD10/96) at the examination on the 27 June 2011.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				follow the ONR's advice irrespective of which zone the proposed development is located in.	
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	Not specified	Policy CS9a is incompatible with the Secretary of State's decision regarding Boundary Hall in Tadley (development proposals in the inner, middle and outer zones need to be considered having regard to impacts on public safety. However, the policy should not imply that those impacts on public safety have such a large weight that there is a presumption against the granting of planning permission for residential developments in the inner land use planning and consultation zone). Policy, supporting text, and footnotes should be amended in light of this.	The Council disagrees with this interpretation of the Boundary Hall decision notice, which the Council regards as site specific. The issue has been debated at length after the Boundary Hall decision was issued (CD10/96) at the examination on the 27th June 2011 Para 403 of the Inspectors decision notice states *"This is a finely balanced case, with one very significant but unlikely harm to be set against a range of more 'conventional' planning considerations. However the consequences of such an unlikely event would be so serious that it is considered that planning permission should not be granted".* The explanation of the text is clear that the policy is needed to meet the requirements of Circular 04/00 and the United Kingdom's Fifth national Report on Compliance with the Convention on Nuclear Safety Obligations.
Great Auclum Estate	Barton Willmore	No	Not specified	We welcome the inclusion of the proposed change text. Whilst this new text indicates the ONR's advice could change to reflect change in circumstances (during the plan period, improvements in the safety of operations at AWE Burghfield resulting from developments including Project MENSA are expected to result in a less restrictive	Should a change in circumstances relating to the consultation zones result in a relaxation of Policy CS9a, Policy CS1 clearly states that the level of house building in the District will be at least 10,500.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				approach toward new housing), the text provides no information regarding how WBC would respond. Policy CS9a should confirm that in such a change of circumstances, WBC would facilitate an increase in housing provision. The policies should include sufficient flexibility so that any response would not necessarily trigger a review of the Core Strategy but capable of being resolved through a lower order plan document. This could include increasing the housing allocation within the East Kennet Valley to approximately 1,200 homes. Burghfield Common should be the first area of search for any increase in housing provision within the East Kennet Valley.	
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	No	The explanation of New Policy CS9 states that it is the Council's intention to "normally follow the ONR's advice in the inner zones". The ONR has already indicated that it would advise against nearly all new residential developments in the inner zones. This policy is therefore in contravention with the Secretary of State's position, established by the Secretary of State's decision on the appeal in Tadley (Reference: 2124548), that whilst the ONR's role is to emphasise the potential implications of an event occurring at AWE it is his role to weigh that advice against the planning case of the development. The Secretary of State's	The Council disagrees with this interpretation of the Boundary Hall decision notice, which the Council regards as site specific. The issue has been debated at length after the Boundary Hall decision was issued (CD10/96) at the examination on the 27th June 2011 Para 403 of the Inspector's decision notice (CD10/96) states *"This is a finely balanced case, with one very significant but unlikely harm to be set against a range of more 'conventional' planning considerations. However the consequences of such an unlikely event would be so serious that it is considered that planning permission should not be granted".*

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				position is reflective of national policy. The Inspector must take a view on whether the wording of this policy sufficiently allows West Berkshire Council to balance ONR's advise against the planning case for individual applications within the inner zone. New Policy CS9 should reflect that the Council will consider applications on a case-by-case basis, weighing up the planning case against the advice received from the ONR.	The explanation of the text is clear that the policy is needed to meet the requirements of Circular 04/00 and the United Kingdom's Fifth national Report on Compliance with the Convention on Nuclear Safety Obligations.
Mr Hugh Dalgleish		No	Yes	Comment refers to Appendix C Removed due to Boundary Hall inquiry, which found if there was a benefit to be gained by permitting planning permission for land that had previously been built on which outweighed the risks from proximity to AWE Aldermaston. However the Inspector did note that this would not necessarily apply to a situation where there was no benefit from re-using land that had been previously used. As the land had been in use, it had been accepted as being at risk previously, and so the proposed development was not as such a new risk.	The Council agrees.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				The only way WBC can be certain of properly discharging its various legal obligations with respect to the two AWE sites in planning terms, is to adopt a presumption against any large scale developments within the DEPZ. Boundary Hall decision does not support removal of constraints against DEPZ developments.	
Further Examination Proposed Focused Change 19 (FEPFC 19)					
Policy CS10 Location and Type of Business Development and Explanatory Text (page 52) **Policy ADPP2 Newbury (Town Centre) (Page 24)**					
Mr Paul Page		No	Yes	The proposed change is unsound on the basis that it is ineffective because mixed development sites should be encouraged rather than just allowed.	The proposed changes to Policy CS10 are specific in terms of relating to B class uses. The wider Core Strategy refers to, and encourages, mixed use developments within its specific Area Delivery Plan policies.
West Berkshire Liberal Democrat Shadow Executive		No	Yes	This representation relates to section (a) and the paragraph which commences 'Proposals for non town centre uses...'. The changes made are unsound. There is insufficient supporting evidence (namely market evidence since the recession began); a lack of evidence of sound infrastructure delivery planning; insufficient flexibility to deal with	The Council considers the paragraph in question is sufficiently flexible to deal with changing circumstances and market changes by ensuring that it can be demonstrated, at the time of such a proposal, that the overall strategy for business development is not compromised. The Core Strategy is supported by an Infrastructure Delivery Plan (IDP) which sets out details on the appropriate infrastructure planning required to

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				recent and future circumstances regarding employment and residential uses; and the draft National Planning Policy Framework not being reflected. See attached documents: 'If not Sandleford then where?' and 'Appendix 8: Reassessment of Newbury Options in SA'. To overcome the soundness issues, the policy should reflect that a proposal for a non town centre use (including housing) need not cause a loss of office floorspace in that particular town centre because mixed use redevelopment can achieve higher volumes of floorspace - it is not a case of 'either/or'. The following wording changes are suggested: CS10(a) (middle of page 73), insert after "Proposals for non town centre uses" the new words "(including housing)". CS10(b) Add after "other than B class uses " (penultimate line page 73) new words "and even new housing". CS10(c) At end of last paragraph, add new sentence: "However, where appropriate, new housing will be encouraged as part of sustainable mixed-use redevelopment of	deliver the Core Strategy. The Council recognises that a proposal for a non town centre use need not always cause the loss of office floorspace and that redevelopment of sites can often achieve higher volumes of floorspace. However, proposals for non town centres uses, such as residential, can result in the loss of office floorspace and therefore the policy seeks to ensure that such proposals do not negatively impact upon the vitality of the centre or substantially prejudice the overall supply of office floorspace within the centre over the plan period. Policy CS10 relates specifically to the location and type of business development, setting in place the framework to facilitate and promote growth and forecasted change of business development across the District over the plan period. The Council has considered the potential for mixed use development and allows for such, as long the overall strategy for business development is not compromised. The Core Strategy makes reference to mixed use developments within its Area Delivery Plan policies e.g. ADPP1 and ADPP2. Note: Two attached documents to this representation – the Council's response to these documents can be found in the Appendix to the responses.

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				employment sites near transport and other facilities, subject to no net loss of office floorspace on those sites."	
Miss Airlie Dyson		No	Not specified	The proposed focused change is unsound because it is not effective or consistent with national policy. The draft NPPF promotes the use of employment land for mixed residential and employment development in addition to the conversion of employment floorspace for residential use through the following: Page 5 para 19 – planning policies and decision should make effective use of land, promote mixed use developments ….enable reuse of existing resources, such as through conversion of existing buildings'. Page 19 para 75 – planning policies should avoid the long term protection of employment land or floorspace'. Page 19 para 76 'recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential developments on appropriate sites'. The wording on page 14 of the FEPFC is not consistent with the draft NPPF: "In making allocation for residential development...any proposed location will be considered". Employment land should be promoted for	With regard to the stated references within the NPPF Policy CS10 does encourage more efficient use of existing sites and premises and promotes the intensification, redevelopment and upgrade of existing, vacant and/or derelict employment sites and premises for business development. The Core Strategy carries forward the Protected Employment Area designation to ensure the health of the local economy is maintained. This designation will be reviewed as part of the Site Allocations and Delivery DPD to ensure the areas remain fit for purpose and continue to be required to support the local economy. The Council recognises the importance of residential developments in maintaining the vitality of centres, but it is also recognised that such developments need to be balanced with the provision of employment. Policy CS10 does allow for non town centre uses, such as residential, within existing centres provided it can be demonstrated that such schemes would maintain the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				mixed residential and employment developments as directed by the NPPF. This will reduce the need for large strategic sites on land presently reserved for nature. The wording in the FEPFC should include the words 'must promote' instead of 'consider' at present.	the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. At the Options for Delivering Homes consultation stage in 2007/08 the preferred option which emerged was for a combination of strategic and smaller urban extensions to meet the greenfield requirement. The Site Allocations and Delivery DPD will examine further the potential for re-allocation of protected employment areas.
W. Cumber and Sons	Savills	No	Yes	Proposed change supported re: addition of final paragraph in part (a) of policy CS10, subject to the replacement of 'business' with 'employment' as suggested in the Inspector's note dated July 2011. This will ensure no ambiguity when it comes to making allocations in the SAD DPD. Concerned that wording may resist certain uses.	Policy CS10 relates specifically to the location and type of business development. The policy and supporting text outlines that business development refers to B class uses as identified within the Town and Country Planning (Use Classes) Order 1987 (as amended) – B1, B2, B8. The word 'business' is therefore clearer in its intentions than the words 'employment use'. The sentence in question goes on to state '….or other economic use to achieve an appropriate sustainable development commensurate with the scale of any proposed allocation will be considered'. This provides additional flexibility.
Vodafone Ltd	Colliers International	No	No	The policy has not been positively prepared therefore fails test within NPPF. There is no	Policy CS10 clearly states that business development will be supported on existing employment sites, particularly

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				clear vision for the Vodafone site or consideration of development post 2011. Policy CS10 should be amended to reflect the NPPF, and in turn policy ADPP2 (forth bullet point) will need to be changed. The Vodafone site should be referenced in the policy or in a separate bespoke policy to reflect the NPPFs thrust on the local economy. The reliance on the Site Allocations and Delivery DPD for the Vodafone site should be reconsidered on the basis that the NPPF states that additional development plan documents should only be used where clearly justifiable. The policy should be amended to: Remove the sequential approach to offices; To ensure that planning polices avoid the long term protection of employment land or floorspace; and that Applications for alternative uses of designated land or buildings for employment purposes should be treated on their merits having regard to market signals and the	sites such as Vodafone. Such sites will be assessed further through the Site Allocations and Delivery DPD to determine whether they should be designated as a Protected Employment Area or an alternative bespoke designation. The policy clearly sets out the Council's intentions for the Vodafone site and other similar employment sites within West Berkshire. The Site Allocations and Delivery DPD is required and justifiable in order to outline smaller site allocations and development management policies to ensure effective delivery of the Strategy. The approach to offices as set out within Policy CS10 has been debated at length at the hearings into the Core Strategy and the sequential approach was included at the request of the Inspector. As set out in 5.45o Protected Employment Areas have been designated through the Local Plan for B class uses to ensure sufficient sites are provided in suitable locations to foster business development and promote sustainable economic growth across the District. A review of these areas will take place as part of the Site Allocations and Delivery DPD. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				relative need for different uses.	class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy. This representation from Vodafone contradicts their previous representation on the EPFC to CS10 in February/March 2011. The changes to Policy CS10 since then have not significantly altered the approach to the Vodafone site or the approach to office developments.
Greenham Parish Council		No	Yes	5.45l says: 'To ensure the vitality of West Berkshire's town and district centres, the loss of office floorspace to a non town centre use will be resisted.' What is meant by 'non town centre use'? Almost any type of use could be argued as town centre. If it is intended that office space should not be re-assigned for housing this is at variance with the NPPF. Clarification of the exact meaning of non town centre use is necessary.	At present town centre uses are defined within Planning Policy Statement 4 and those uses not defined as such are classed as non-town centre uses. Paragraph 5.45l goes on to state '…where loss of such floorspace would impact upon the vitality of the centre and/or would substantially prejudice the overall supply of floorspace within that centre'. Therefore, the policy and supporting text do allow for the loss of office floorspace within defined town and district centres to non town centre uses, provided it can be demonstrated that such schemes would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre. This approach to office developments within existing centres has been previously debated at the hearings into the Core Strategy.
Further Examination Proposed Focused Change 21 (FEPFC 21)					

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Policy CS14 Transport and Explanatory Text (Page 61)					
Greenham Parish Council		No	Yes	WBC has still failed to recognise that there is no public right of way to Newbury Racecourse Station and it has not taken any action to secure such right of way. There is a presumption of access and a dependence on it that are not supported by reality. GPC notes that despite the total absence of any impaired-mobility access and the impending adjacent development, Newbury Racecourse station was not granted any Access for All funding in December 2011. WBC should take proper notice of the lack of legal access to the Racecourse Station and take action to remedy this. It should make a specific undertaking to achieve legal access, car parking facilities and mobility-impaired access. None of these presently exists.	Comment not relevant to this section of the Core Strategy. Appendix Cii covers pedestrian access. The Infrastructure Delivery Plan (IDP) will provide further detail with regard to infrastructure. Any future planning application for the site will have regard to access.
Further Examination Proposed Focused Change 22 (FEPFC 22)					
Appendix Cii: Critical Infrastructure Schedule of the Infrastructure Delivery Plan (Page 128)					
Thames Water Property		Not specified	Not specified	Appendix Cii talks about infrastructure needed to serve the development sites. We consider that it should be stated that this list is not exhaustive. As exact details of phasing	The first paragraph of Appendix Cii states that the Infrastructure Delivery Plan (IDP) (which is a separate document) will be updated periodically to take account of

Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				and development locations evolve so will the water and sewerage infrastructure needs of the developments.	changing circumstances. The delivery and monitoring section of Policy CS6 also makes reference to the fact that the Council will be maintaining an Infrastructure Delivery Plan which contains a 'live' schedule that will be updated as further infrastructure requirements or projects are identified, and as the Site Allocations and Delivery DPD is taken forward. The IDP identifies the amount, cost, and sources of funding needed to support the growth proposed in the Core Strategy. It is prepared in conjunction with infrastructure providers.
Further Examination Proposed Focused Change 23 (FEPFC 23)					
Appendix E: Local Plan Policies Replaced by the Core Strategy (Page 128)					
Vodafone Ltd	Colliers International	No	No	Policy ECON1 should not be deleted from Appendix E unless the recommendations set out with regard to policy CS10 (FEPFC 19) are incorporated.	If Policy CS10 is adopted in its current form then Local Plan policy ECON1 needs to be deleted or both these policies would be in conflict with each other.

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APPENDIX C

Further Inspector Proposed Focused Change (FIPFC)

This table sets out a summary of each individual representation received in response to the consultation on the Further Inspector Proposed Change to the Submission Core Strategy. The table also sets out the officers' proposed recommendation as to how the Council should reply.

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
North Wessex Downs AONB		No	Yes	We consider that the overarching housing objective for the AONB should be to meet identified local housing needs, not 'appropriate and sustainable growth that conserves and enhances its special landscape qualities'. 'Sustainable growth' is not the purpose of AONBs. The current wording of ADP Policy 5 neglects a range of issues on which neither the Council nor any other contributor has rebutted significant evidence submitted by ourselves. The proposed new wording of 'adhering to the landscape priority of the policy' is too vague and a matter of interpretation, and provides no reliable basis for adjudicating between proposals. We suggested that with affordable housing on exceptions sites and suitable development on brownfield sites the acceptable provision in the Plan could sum to 1,400 dwellings. The AONB housing figure should be reduced to a realistic 1400, with any additional housing being restricted to Hermitage and Compton brownfield sites	The housing provision for the AONB was discussed at the Hearing Session on 28th June 2011 and the Inspector's Note (2) – July 2011 which stated (para 3.23) that the Further Proposed Focused Change was required for soundness, was in response to those discussions. The change has been made to emphasise that provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. The consultee believes that the yardstick of adhering to the landscape priority is too vague and a matter of interpretation, providing no reliable basis for adjudicating between proposals. The Council does not accept this and believes that landscape analysis will be critical in assessment of sites for allocation in the Site Allocations and Delivery DPD. The Council therefore considers that the proposed ADPP5 which incorporates the FIPFC (or FEPFC9) makes it clear how the

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
				and rural affordable exception sites.	policy should be applied. If it would be helpful however, for further clarification, the Housing sub section bullet point 2 could be amended to read: 'There will be further opportunities for infill development and for development on previously developed land. New housing allocations will be focused on the Rural Service Centres and Service Villages within the North Wessex Downs, with the emphasis on meeting identified local needs. The development will be allocated through the Site Allocations and Delivery DPD or a subsequent planning document, and will depend on the role and function that the settlement performs, supported by suitable development opportunities, identified through the SHLAA. The conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing these sites.' The Council contends that a policy constraining market housing, as suggested by the consultee, would not meet the Council's objectives, set out in various policy statements, to foster sustainable rural communities. Market housing is an important means of providing for affordable housing to meet local needs and of supporting local services and facilities. The position with regard to completions and commitments within the AONB at March 2011 is

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
					that 788 additional homes have been delivered since 2006 and permission remains for a further 447 (See LDF Annual Monitoring Report 2011). The suggestion to limit numbers to 1,400 would therefore only leave an additional 165 dwellings to be permitted and delivered over the next 15 years. This level of provision would be equivalent to approximately 40 dwellings per annum in the AONB for the period 2011- 26, only 26% of the average annual delivery in the period 2006 – 2011.
Mr D W Bending		Yes	Yes	Both the Inspector's wording and that proposed by WBC are compliant and sound but their preference would be for the WBC wording since it adds a useful measure of clarification.	Preference for FEPFC9 over FIPFC1 noted.
Pangbourne Parish Council		Yes	Yes		Support noted.
Streatley Preservation Action Group		No	Not specified	Agree with the Council's position that the Inspector's amendment could be confusing and could be read as an additional 2000 homes in AONB.	Preference for FEPFC9 over FIPFC1 noted.
Cllr Alan Law		No	Not specified	I understand the Inspector's intentions and agree with them, but I consider the alternative wording put forward by Officers to be clearer and they achieve the same result.	Preference for FEPFC9 over FIPFC1 noted.
Greenham Parish		No	Yes	The proposed wording would allow the Council to allocate any shortfall within the AONB to anywhere within	The proposed wording has been included to clarify that the overarching objective for the

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
Council				the District.	AONB is the conservation and enhancement of its special landscape qualities. If work on the Site Allocations and Delivery DPD indicates that a lower housing target than 2,000 is more appropriate for the AONB in order to adhere to the landscape priority of the policy, allocations outside the AONB would need to be made in order to conform to Policy CS1. Any such allocations would be related to the settlement hierarchy outlined in CS1 and would be in conformity with the relevant ADPP Policy. The housing figures in the ADPP policies are approximate at the strategic level of the Core Strategy – the Site Allocations DPD will be prepared in conformity with the Core Strategy but will provided more detail on the housing distribution based on the more detailed work required for site allocations for housing.
Highways Agency		Not specified	Not specified	The Further Inspector Proposed Focus Change (FIPFC) do not cause any concern to the HA	Comments noted.
Natural England		Not specified	Not specified	Concerns with FIPFC1, and wish for them to be withdrawn. Concerned that while the policy will prevent damage to the AONB it may be unimplementable. It is unclear what proportion of the allocation will be captured in the Site Allocations and Delivery DPD and therefore advice that the policy should not support the granting of planning permission of an application which is neither in the SAD DPD or conserves and enhances the AONB.	The change has been made to emphasise that provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. However, the consultee believes that the policy may be unable to be implemented. The Council does not accept this and believes that landscape analysis will be critical in assessment of sites for allocation in the Site Allocations and Delivery

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
				There should be more detail as to what constitutes "appropriate and sustainable growth that conserves and enhances its special landscape qualities." The policy only relates to development within the AONB, there maybe development outside the AONB which impacts on it. Rationale for adopting FEPFC9 over FIPFC1 appears reasonable and should give clearer protection to the AONB.	DPD. The Council therefore considers that the proposed ADPP5 which incorporates the FIPFC (or FEPFC9) makes it clear how the policy should be applied. If it would be helpful however, for further clarification, the Housing sub section bullet point 2 could be amended to read: 'There will be further opportunities for infill development and for development on previously developed land. New housing allocations will be focused on the Rural Service Centres and Service Villages within the North Wessex Downs, with the emphasis on meeting identified local needs. The development will be allocated through the Site Allocations and Delivery DPD or a subsequent planning document, and will depend on the role and function that the settlement performs, supported by suitable development opportunities, identified through the SHLAA. The conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing these sites.' The Council intends to progress the Site Allocations and Delivery DPD as soon as possible following the adoption of the Core Strategy. Until housing allocations are made through the SAD DPD, the policies in the West Berkshire District Local Plan will continue to apply, with housing development outside of

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
					existing settlement boundaries being contrary to adopted policy and consequently likely to be refused. Policy ADPP5 (Environment sub section bullet points 1 and 2) gives more detail about what is meant by 'appropriate and sustainable growth'. The Policy also needs to be read in conjunction with other policies in the Core Strategy such as ADPP1, CS1, CS20 and national guidance. The Council believes that the Core Strategy, particularly Policy CS20, together with national guidance contained in PPS7, the AONB Management Plan and other associated documents, contain sufficient guidance to consider development proposals located outside the AONB but which could potentially impact upon it. Preference for FEPFC9 over FIPFC1 noted.
Croudace Strategic Ltd	Director Boyer Planning Ltd	No	Yes	Support the Inspector's proposed changes for the 1st point of ADPP5. The figure of up 2000 dwellings in the AONB is still considered too high. Housing development in the AONB should be small scale, infilling and should respond to the needs of the local community. It is considered inappropriate to allocate a specific number of dwellings to the area; instead there should be reallocation of housing numbers to the main urban areas.	These issues were raised and discussed at the Hearing Session on 28th June 2011 and the Inspector's Note (2) – July 2011 which stated (para 3.23) that the Further Proposed Focused Change was required for soundness, was in response to those discussions. Given the objective of promoting sustainable communities in both urban and rural areas of the

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
					District the Council feels that some guidance on the potential scale of development in the AONB should be contained in the Core Strategy.
Gerald Palmer Eling Trust	West Waddy ADP	No	Not specified	Objection to the focused change as it provides an absolute maximum for housing provision but no minimum meaning the council would accord with this policy even if it did not grant planning permission for any further housing development. This could cause a sustainability disaster in terms of affordable housing and loss of services and facilities from communities.	Though no minimum number is set out in the policy ADPP1 clearly states that development will comply with the overall spatial strategy set out in the Area Delivery Plan policies. ADPP5 goes on to state that the "AONB will have appropriate and sustainable growth..." set within the limitations of the overarching objective to conserve and enhance the special landscape qualities.
Mr Keith Carter		Yes	Yes	Supports the change as it gives a clearer maximum of 2000 in the AONB and confirmation that should the need to protect the landscape cause a shortfall the balance will be allocated outside the AONB. Brownfield sites of Compton and Hermitage should be mentioned in the document.	Comments noted. The sites at Compton and Hermitage are specifically mentioned in ADPP5 (Housing sub section bullet point 8).

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Appendix D

Soundness of Core Strategy in relation to draft National Planning Policy Framework

This table sets out a summary of each individual representation received in response to the consultation on the soundness of the Core Strategy in relation to the draft National Planning Policy Framework (NPPF). It also sets out the officers' proposed recommendation as to how the Council should reply.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
West Berkshire Submission Core Strategy Incorporating Further Examination Proposed Changes				
Pangbourne Parish Council		Yes	Support	Comment noted. No response required.
Mr D W Bending		Yes	Streatley Parish Council and Basildon Parish Council have both considered the soundness of the Core Strategy with respect to the NPPF and take the view that the CS is sound in that respect since it is clear from the drafting of the NPPF that the Government intends such strategies to be attuned to local circumstances rather than slavishly following the, in some cases rather vague, provisions of the NPPF.	Comment noted. No response required.
Newbury Town Council		No	Newbury Town Council has mixed views on the proposed NPPF - summarised in its response to the DCLG consultation on 27/9/11. Given that the NPPF is still at consultation stage, not yet implemented and may still be radically altered it seems premature to assess the Core Strategy against	Comment noted. However, as the NPPF advocates a 'plan-led' system, the Council's view is that it is essential to get the Core Strategy and any subsequent DPDs in place. The Core Strategy is based on the outcomes of local evidence and local consultation and will provide a positive planning framework for West Berkshire. Without it, the Council would be dependent on the ageing saved policies of the Local Plan to make planning

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			it, as the effectiveness of the Core Strategy will only be proven in practice. Our deep fear remains that with the sweeping away of so much National Planning Policy, without the Core Strategy having the opportunity to include that which is still relevant, that the Core Strategy will be ineffective in ensuring appropriate development. When the NPPF is in place, the Core Strategy will need to be completely revised.	decisions – plus the risk that if a 5-year housing land supply was not in place that there would increasingly be planning by appeal in the District and that the Council would lose control over the future location of development.
Streatley Preservation Action Group		Yes	Support Core Strategy seems to complement the Draft NPPF. Only confusion would concern which policy, local plan or national plan, applies to houses within settlements in AONB	Support noted. No response required in this respect. Both national and local policies apply to houses within settlements within the AONB. National level policies are more generic. Local policies (contained within the Core Strategy) are specific to the North Wessex Downs AONB.
The Theatres Trust		Not specified	Because the draft NPPF lacks substance and is a policy vacuum for cultural policies, and the Core Strategy has no policies to support its cultural offer, town centre vitality and evening economy to reflect PPS4, the Theatres Trust are in no position to argue for their inclusion.	ADP policies contain sections on community infrastructure (ADPP1, ADPP2, ADPP3, ADPP4, ADPP5, and ADPP6). This encompasses cultural facilities. The Council has a Cultural Plan which sets out a clear strategy and aims. The document can be viewed at: http://www.westberks.gov.uk/index.aspx?articleid=19782.
Mr Peter Besent		Not specified	Being in a rural area, but NOT Green Belt or National Park it does appear that 'open countryside' will be under threat. I have yet to find where it states that there will be a predisposition to 'approve' applications.	Open countryside' will not necessarily be under threat as a result of the NPPF. Confusion is made in the representation in respect of the term 'presumption in favour of sustainable development'. There is no 'predisposition' to approve applications. The key word phrase is

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
				'sustainable development' and this does not mean all development.
Cllr Alan Law		Yes	Given that, under Localism, the Local Plan once properly examined and approved, would carry significant weight, I could see nothing specific in the DNPPF which would imply the Core Strategy or any part of it was unsound.	Comment noted. No response required.
Highways Agency		Yes	The core strategy can be seen as being in accordance with the draft NPPF. In accordance to paragraph 4.51 of PPS12: Local Spatial Planning, the West Berkshire Core Strategy can be considered sound.	Comment noted. No response required.
Sandleford Partnership	White Young Green	Yes	Whilst the draft NPPF postdates the submitted Core Strategy, it is considered the work undertaken by the Council in producing the submission Core Strategy has taken in to account the key issues and thrust of this document, and provides a robust positive framework that supports sustainable development and meets the proposed requirements of the draft document. The Core Strategy is a 'positively' written document which provides a clear framework to support sustainable growth both in terms of housing and employment land, whilst providing appropriate protection for the natural and historic environment. Housing and employment floorspace figures are not prescriptive in terms of maximum numbers with the guidance being clear and based on sustainable principles which provide an appropriate framework for the type of development which is acceptable. It is considered the draft Core Strategy as drafted will	Comment noted. No response required.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			deliver sustainable development as required by the draft NPPF, and will provide an appropriate plan-led system for the for West Berkshire which will plan for prosperity (an economic role), plan for people (a social role), and plan for places (an environmental role). The proposed Core Strategy meets the core planning principles of the draft NPPF, as well as adhering to the guidance with regards to plan making and a plan led system. We are conscious that the NPPF is only a draft document at this stage and that elements may change, however it is considered unlikely that the main thrust of the document and the commitment to sustainable development will change. On that note it is considered that it would be in the interests of West Berkshire and its community that the submitted Core Strategy is found sound at the earliest opportunity, and the forthcoming NPPF should not be used as an excuse to delay this any further. On this basis in order that the Core Strategy is flexible and can successfully deliver the sustainable development and the needs of its district it is considered that an early review of the Core Strategy would allow the Council to have in place an adopted Core Strategy providing an appropriate sustainable and plan led framework for development whilst giving flexibility to any further changes in Government guidance.	
Gladman Developments Ltd		Not specified	The National Planning Policy Framework (NPPF) promotes growth through a proactive planning system that encourages and facilitates development.	The policies within the Core Strategy do not constrain growth. Instead they have been worded to ensure that there is a balance of development for example, through the protection of

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			The Core Strategy should not arbitrarily constrain growth through restrictive policies and insufficient allocations that prevent the housing needs of the District being satisfied during the plan period. The Core Strategy should be robust in meeting the 'real' housing need as identified by the Strategic Housing Market Assessment (SHMA) and should not have an arbitrarily reduced and therefore artificial housing target. The Core Strategy should positively embrace development that meets the social, economic and environmental needs of the District.	employment land and town centres. In respect of the comment on the housing target (third paragraph), a change has been consulted on through the Further Examination Proposed Focused Changes which includes the wording 'at least' in front of 10,500 dwellings. There is additional flexibility built in to the Core Strategy, which has been discussed at the hearings in June 2011. The Council maintains that it is planning for sustainable growth as outlined in its response to the Ministerial Statement on Planning for Growth, viewable on the following webpage http://www.westberks.gov.uk/index.aspx?articleid=22820

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
A2 Housing Group & Angus Janaway	Barton Willmore	No	The Core Strategy is not considered sound in relation to the NPPF as it is neither justified, effective or consistent with national policy. Despite being a consultation (draft) document the NPPF outlines the direction of travel for Government policy and therefore DPDs need to comply with it. In light of the NPPF intention to support sustainable economic growth, we question whether all the ADPPs carry forward the Council's proposed change to CS1 which sets out that the housing delivery is minimum not a maximum. Consideration should be given to rewording all ADPPs to reflect this. Also question whether the Core Strategy as proposed provides the flexibility to meet potential changes, especially given the level dependence on Newbury to deliver housing. The NPPF states that 'every effort should be made to meet the housing, business and other development needs of an area..' - the evidence base for the Core Strategy indicates that 10,500 homes will not meet the housing need of the area. Changes policy CS1 do allow for some flexibility but the other ADPPs needs amended also and larger scale development in appropriate locations should be considered acceptable in principle. The NPPF states that planning policies should take account of local circumstances and market signals - given that Newbury has some of the highest land and property prices within the area consideration should be given to whether the strong reliance on Newbury to	Following the debate over the content of the draft NPPF at a national level (the Government's Select Committee has raised areas that the NPPF will need to consider) it can be considered likely that the draft NPPF will change in content before it is finalised. There are a number of factors which introduce flexibility in to the plan, and these have been discussed at the hearings in June 2011. The housing figures in the ADPP policies are approximate at the strategic level of the Core Strategy – the Site Allocations DPD will be prepared in conformity with the Core Strategy but will provide more detail on the housing distribution based on the more detailed work required for site allocations for housing. Whilst there will be a review of housing numbers in partnership with adjoining local authorities, a Core Strategy Examination is not the appropriate time to do this. The Inspector's note (dated September 2011) did not raise any concerns with the evidence base being out of date. Information on local circumstances and market signals have underpinned individual policies in the LDF, e.g. on affordable housing through the SHMA and viability assessments, and employment policies through the Employment Land Review process. The Council recognise the importance of residential developments in maintaining the vitality of centres, but it is also

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			deliver housing is still the most appropriate strategy. We continue to have concerns over some of the Council's evidence base which is no longer up to date e.g. SHMA and ELA - these documents will need to be updated before the Core Strategy can be found sound. NNPF states that residential development can play an important part in ensuring the vitality of centres - the Council have sought to restrict the level of development in Thatcham therefore contradictory to the NPPF. In conclusion the Core Strategy does not comply with the draft NPPF.	recognised that such developments need to be balanced with the provision of town centre uses. Policy CS10 does allow for non town centre uses, such as residential, within existing centres provided it can be demonstrated that such schemes would maintain the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre.
Relationship with other Strategies				
Cold Ash Community Partnership		No	This issue centres on whether the submitted Core Strategy is found to be sound by the Inspector or not. If it is found to be sound then we have no issue since our refreshed Cold Ash Parish Plan is part of the embedded evidence base in 2.14. If it is found to be unsound and the NPPF assumes final form as per the draft then we have a major issue of community involvement, since under the draft NPPF only Neighbourhood Plans will be considered. We have invested significant time and effort to produce a refreshed Parish Plan and we need this to still be	Comment noted. No response required.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			recognised under the NPPF even if this is only for a transition period of say 5 years until such time as a new 'Core Strategy / Neighbourhood Plan' for West Berkshire is created, inspected and approved.	
Cross Boundary Issues				
Home Builders Federation		Not specified	The draft NPPF places emphasis on the importance upon local authorities of addressing planning issues that straddle administrative boundaries. Unclear in paragraph 2.5c how far the Core Strategy has made provision for the actions of other authorities, including those who form part of the wider housing market area. The Council will need to demonstrate that other local authorities are also adopting the RS housing targets, and related strategies for delivery, otherwise undersupply elsewhere could have cross-boundary implications for West Berkshire. We do not believe that these cross boundary tensions have been explored adequately.	The Berkshire Strategic Housing Market Assessment, http://www.westberks.gov.uk/index.aspx?articleid=12148 forms part of the evidence base for the Core Strategy. This document considered the wider housing market relevant to West Berkshire The West Central Berkshire sub-region includes Reading, Wokingham and Bracknell in addition to West Berkshire. The other authorities within this sub-region have adopted Core Strategies in place to meet the housing targets set out in the South East Plan. Adjoining authorities will be consulted on planning applications that will have cross-boundary impacts (as has always been the case). They will also be cross-boundary working on the Sites and Allocations Development Plan Document.
Strengths, Weaknesses, Opportunities and Threats				
Renewable UK		Not specified	The SWOT analysis in the Background and Challenges chapter recognises the delivery of renewable energy schemes through the development of strategic sites as an opportunity. While this is in line with the draft NPPF, RenewableUK does not support site identification for wind energy projects. Our view is that if local authorities decide to identify sites, they are	The Council maintains that there is an opportunity for a number of different types of renewable energy schemes, not just wind energy, to be used on identified strategic sites within the district, which by their nature will have the scale to be implemented.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			likely to not be of a sufficient scale for large scale projects.	
Spatial Vision				
Renewable UK		Not specified	Paragraph 3.6 of the Core Strategy (Spatial Vision) states that West Berkshire Council will play a full role in reducing carbon emissions through increased generation of renewable energy and other measures, which is welcomed by RenewableUK. We support this vision, however would suggest that instead of a 'full role' which is not clearly worded, the Strategy state 'will reduce carbon emissions as much as possible through increased generation of renewable energy'.	The suggested word change does not improve the meaning of the Spatial Vision.
Strategic Objectives				
Croudace Strategic Ltd	Boyer Planning Ltd	No	The change in wording to: "the delivery of at least 10,500 net additional dwellings" is welcomed because it ensures that the Core Strategy is in line with paragraphs 10 and 52 of PPS3 which seek to ensure that a sufficient quantity of housing is identified and a continuous supply of deliverable sites is maintained.	Comment noted. No response required.
Introduction				
West Berkshire Liberal Democrat Shadow		No	The draft NPPF reintroduced an emphasis on mixed use. To be regarded as sound, the Core Strategy should also reintroduce a more general emphasis on mixed use. The property market in Newbury in particular has shown the market wants this.	No change required. Mixed use developments are facilitated where this is appropriate. The Council recognise the importance of residential developments in maintaining vibrant places, but it is also recognised that such developments need to be balanced

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
Executive			Paragraph 4.1 should be reinstated, with 'Draft National Planning Policy Framework' replacing 'South East Plan'.	with the provision of, for example, employment. Paragraph 4.1 was deleted following the revocation of the South East Plan and references to the SE Plan or the RSS have not been reinstated in order to future-proof the Core Strategy. The principles set out in 4.1 have been carried through into the spatial strategy set out in the Core Strategy. It is not considered appropriate to introduce references to the Draft NPPF when the final version has not yet been published.
Spatial Strategy				
West Berkshire Liberal Democrat Shadow Executive		No	In light of paragraphs 19, 75, and 76 of the draft NPPF, ADPP1 should include more emphasis on the ability of residential development within mixed uses to ensure 'vibrant places' result from redevelopment of highly sustainable town centre sites. With very few exceptions, West Berkshire Planning Policy has failed to recognise the role that residential-led development can play in ensuring under-used and semi-derelict employment land can be redeveloped very viably. Second paragraph on page 24, line 3 of the Core Strategy: insert '(often residential led)' after 'major mixed use'.	No change required. Mixed use developments are facilitated where this is appropriate. The Council recognises the importance of residential developments in maintaining vibrant places, but it is also recognised that such developments need to be balanced with the provision of employment.
Croudace Strategic Ltd	Boyer Planning Ltd	No	The Ministerial Statement dated 23 March 2011 noted the answer to development and growth should, where possible, be 'yes', except where this would compromise the key sustainable development principles set out in the National Planning Policy. Croudace therefore support the addition in the wording	Comment in first paragraph noted. No response required. The housing figures in the ADPP policies are approximate at the strategic level of the Core Strategy – the Site Allocations DPD will be prepared in conformity with the Core Strategy but will provided more detail on the housing distribution based on the

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			of 'at least' in front of the '10,500 net additional dwellings'. The wording of the Area Delivery Policies do not reflect this change, and should therefore be amended to include the word 'at least'. This would not be appropriate for the AONB area policy. As it stands, the continued use of the word 'approximately' in this policy does not provide sufficient flexibility, and could limit the number of new homes permitted in an area. It could also be used as a reason to refuse developments which propose dwellings that would take an area over its intended target. Contrary to PPS3 and the Government's growth policy.	more detailed work required for site allocations for housing.
Home Builders Federation		Not specified	Area Delivery Plan Policy 1 (the Spatial Strategy) places too many restrictions on the supply of market housing in rural areas through the district settlement hierarchy. The NPPF sets out the Government's objectives to increase housing supply and this will include providing homes in places where people want to live. Area Delivery Plan Policy 5 in specifying that Rural Service Centres and Service Villages need only provide for "identified local needs" would not be in conformity with the NPPF.	The Council acknowledge that one of the Government's objectives in the draft NPPF is to increase housing supply including in areas where people want to live. However, it is essential to consider the function, role, and facilities in towns and villages to ensure that development can be supported and thus sustainable. The Draft NPPF places great emphasis on sustainable development.
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	Insufficient consideration has been given to development at Tadley because the town itself lies within both a different district (Basingstoke and Deane) and county (Hampshire). Paragraphs 44-47 of the draft NPPF places a duty on local authorities to cooperate with neighbouring authorities.	Policy CS9a deals with a unique situation which exists in this area regarding the AWE sites and the level of development that will be permitted. .

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			Land to the north of Tadley should be identified either as a location for strategic development and/or Tadley should be included in the list of Rural Service Centres in ADPP1.	The Settlement Hierarchy Topic Paper (2010) sets out the background research and evidence to support the development of the settlement hierarchy for the LDF. The consideration of proximity to Tadley was a consideration in the settlement hierarchy methodology; however Tadley is located outside the District boundary. Though cross boundary working takes place and is particularly important in this area, it is for Basingstoke and Deane Borough Council to assess the role and function of Tadley in consultation with the Borough's residents. The potential strategic sites have been through various stages of appraisal throughout the development of the Core Strategy. Paragraph 4.4 of the Strategic Sites SA Policy Paper explains why the Silchester Road, Tadley site was eliminated from the consideration of strategic sites. Any potential allocation would need to be considered in the Site Allocations and Delivery DPD, in co-operation with Basingstoke and Deane BC and taking account of development plan policies in Basingstoke and Deane and of Policy CS9a. . Paragraphs 2.31 and 2.31d of the Core Strategy Background and Challenges section, states that "A cross-border working group exists between West Berkshire Council, Hampshire County Council and Basingstoke and Dean Borough Council on areas of common concern..."
Greenham Parish Council		No	Reference in the Core Strategy to mixed use development is limited to existing employment land and the only reference to residential-led mixed use is for one particular site.	Mixed use developments are facilitated where this is appropriate.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			The CS should be revised to ensure encouragement of mixed housing/commercial development and housing requirements elsewhere should be reduced accordingly.	
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to: - Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents; - Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need; - Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually constrained economic growth; - Recognise the relationship between housing and other forms of development- particularly employment; - Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional	The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			relationship with Reading; and - Comply with the objectives, principles and policies of the NPPF especially as it fails to promote a presumption in favour of development.	critical elements of the evidence base. The detailed points raised by Pegasus Planning and the Council's response are set out in Appendix H.
Gladman Developments Ltd		Not specified	The Core Strategy should positively manage growth in order to facilitate a step change in increased housing delivery as promoted by the NPPF. Whilst the Urban Areas should accommodate the majority of new development this should not prevent sustainable development coming forward in lower order settlements. ADPP1 outlines the settlement hierarchy. Whilst recognising that The Urban Areas should accommodate the majority of new housing and employment development in order to continue to support services, community facilities and essential infrastructure, this must not be interpreted as an exclusion of sustainable development in lower order settlements - see para 19 bullet point 8 of the NPPF. Alongside managing the location of growth, the Core Strategy should positively manage the scale of growth in order to facilitate a step change in increased housing delivery as promoted by the NPPF. The Local Authority needs to allocate sufficient land to meet identified need over the plan period. The supporting text to the policy notes that detailed proposals for site allocations, apart from the strategic allocations within the Core Strategy, will be detailed by	The Council acknowledges that one of the Government's objectives in the draft NPPF is to increase housing supply including in areas where people want to live. However, it is essential to consider the function, role, and facilities in towns and villages in accordance with the District's settlement hierarchy to ensure that development can be supported and thus is sustainable. The Draft NPPF places great emphasis on sustainable development. The adoption of the Site Allocations and Delivery DPD is dependent upon the adoption of the Core Strategy. The timetable for its preparation has unfortunately slipped due to the extended Core Strategy Examination. The Council's SHLAA is updated on an annual basis, and this informs the districts five year housing land supply (which is also updated on an annual basis).

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			the Site Allocations and Delivery DPD. However, there are no timescales for the adoption of this document. Therefore, the Local Authority's ability to ensure a sufficient supply of land during the plan period is flawed. It is recommended that a Contingency Policy should be included within the Core Strategy. Our recommended Contingency Policy is detailed in the representation to Policy CS1 –'Delivering New Homes and Retaining the Housing Stock' . The recommended Contingency Policy should be taken forward in order to ensure a continuous supply of housing during the plan period.	
Newbury and Thatcham				
West Berkshire Liberal Democrat Shadow Executive		No	In the context of NPPF19 and NPPF76, the high densities of residential development forming just part of several recent planned/approved/under construction sites in Newbury town centre, and the amount of under-used and semi-derelict employment land on the periphery of the town centre, a very significant contribution to Newbury's housing numbers could be made without taking up a strategic sized greenfield urban extension. ADPP2: Newbury Housing: after 'later in the plan period' replace 'to the south at Sandleford' with 'through mixed-use residential-led regeneration of sites in a broad location on the eastern periphery of the town centre, mainly in the London Road Industrial Estate'. ADPP2: Newbury Town Centre third bullet point: after	The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. No change to policy ADPP2. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			'hotel' add 'as well as substantial amounts of housing (see above)' These two changes would eliminate the need for a second urban extension of strategic size (Sandleford or North Newbury) at this time.	prejudice the strategy set out within the policy. In respect of the recommended addition to the third town centre bullet point in ADPP2, the Council will review the designation, role and boundaries of existing Protected Employment Areas in the Site Allocations and Delivery DPD as set out in Policy CS10. Some residential use has been permitted in this area but it is unlikely that the site (or a broad location in the area) could deliver the housing mix and infrastructure planned for the strategic site at Sandleford, even if issues relating to the Protected Employment designation and location of a substantial part of the area within Flood Zone 3.were resolved to favour allocation for residential led mixed use development as proposed.
Croudace Strategic Ltd	Boyer Planning Ltd	No	ADDP3 goes against the advice in PPS3 and the Government's growth policy in that the policy does not include sufficient flexibility to allow for more homes than stated. In addition, the continued use of the word 'approximately' could limit the number of homes allowed in the area, and could be used as a reason to refuse developments which propose dwellings that would take the area over its intended target. Paragraph 156 of the draft NPPF refers to Local Plans applying a sequential, risk-based approach to the location of development to avoid flood risk. Amongst the criteria is using opportunities offered by new developments to reduce the causes and impacts of flooding. Housing development north of Bowling Green Road is the only practical solution to solving the flooding issue in Thatcham.	The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. The housing figures in the ADPP policies are approximate at the strategic level of the Core Strategy – the Site Allocations DPD will be prepared in conformity with the Core Strategy but will provide more detail on the housing distribution based on the more detailed work required for site allocations for housing. Policy CS17 of the Core Strategy has regard to flooding, and, amongst other criteria, requires a sequential approach for development in areas of flood risk. A Surface Water Management Plan has been prepared for Thatcham, and any development proposals in the Thatcham area will need to have regard to this.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
North Wessex Downs AONB				
North Wessex Downs AONB		Yes	Because of the significant developments to the evolution of the draft NPPF, we consider that the draft NPPF is not a document which can be relied upon for shaping policy in the West Berkshire Core Strategy: the final version is likely to be distinctly different.	Comment noted. No response required.
Hungerford Town Council		Not specified	Housing Numbers in the AONB: the draft NPPF seeks the protection and enhancement of the historic environment should be given sufficient weight - the housing numbers detailed in the Core Strategy will not meet this requirement. Additionally, local authorities are required to identify land which is genuinely important to protect from development because of its environmental or historical value. Traffic Congestion: draft NPPF directs that the planning system should support a pattern of development which, where reasonable, facilitates the use of sustainable modes of transport which help to reduce greenhouse gas emissions and reduce congestion. The Hungerford site identified within the SHLAA will not meet this requirement because they are on the edges of the town. Town Centres: weight to parish and town plans should be given, local authorities need to address the needs for all types of housing, which sustainability appraisal an integrated part of the plan process with consideration of all significant environmental, economic, and social effects. The Core Strategy does not meet these strategic objectives.	The housing provision for the AONB was discussed at the Hearing Session on 28 June 2011. ADPP5 clearly states the objective of appropriate and sustainable growth, set within the limitations of the overarching objective to conserve and enhance the special landscape qualities of the AONB. ADPP5 (Environment sub section, bullet point 2) details how development will respect and respond to the historic environment of Hungerford. The Council believes this approach fully complies with the principles of the draft NPPF The Site Allocations and Delivery DPD will be prepared in conformity with the Core Strategy and individual sites put forward in the SHLAA will be assessed further at that stage. This will include transport impacts and the appropriate type and mix of housing. Sustainability appraisal will be an important part of that process. Para 5.119 of the Core Strategy makes it clear that where community plans have been adopted or endorsed by the Council they will be used to inform and support the policies contained within the Core Strategy. Any planning application over 80 dwellings would need a travel plan, and all planning applications need to show how they apply to policy CS14 of the Core Strategy in terms of reducing the

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
				need to travel.
Renewable UK		Not specified	ADPP5 encourages opportunities for small scale renewable energy schemes. Policies CS3 and CS4 have similar provisions for Newbury Racecourse and Sandleford. While Renewable UK supports these, it considers that could be strengthened by a core policy on renewable energy.	Policy CS16 relates specifically to renewable, low and zero carbon energy. Para 5.77 of the Core Strategy relates to decentralised renewable energy generation.
Home Builders Federation		Not specified	ADPP1 places too many restrictions on the supply of market housing in rural areas through the district settlement hierarchy. The NPPF sets out the Government's objectives to increase housing supply and this will include providing homes in places where people want to live. ADPP5 in specifying that Rural Service Centres and Service Villages need only provide for "identified local needs" would not be in conformity with the NPPF	The Council acknowledges that one of the Government's objectives in the draft NPPF is to increase housing supply including in areas where people want to live. However, it is essential to consider the function, role, and facilities in towns and villages in accordance with the District's settlement hierarchy to ensure that development can be supported and thus is sustainable. The Draft NPPF places great emphasis on sustainable development.
Gerald Palmer Eling Trust	West Waddy ADP	No	The amendments to policy ADPP5 would conflict with a number of principles of the draft NPPF, namely a presumption in favour of sustainable development (paragraph 14), a significant increase in the delivery of new homes (paragraph 107), a need for local authorities to be responsive to local circumstances (paragraph 112), policies and decisions needing to safeguard against the unnecessary loss of valued services and facilities (paragraph 126), and in preparing plans to meet development requirements, the aim should be to minimise adverse impacts on the local and natural environment (paragraph 165).	The housing provision for the AONB was discussed at the Hearing Session on 28 June 2011 and the Inspector's Note (2) – July 2011 which stated (paragraph 3.23) that an amendment to ADPP5 was required for soundness, was in response to those discussions. The change has been made to emphasise that provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB. The Council believes this fully complies with the principles of the draft NPPF. The Council's proposed wording for this policy is different from that proposed by the Inspector, in that it is designed to provide an element of flexibility in development management terms.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			To overcome these issues, the previous wording of ADPP5 should be returned to: 'the area will accommodate approximately 2000 dwellings'. The new wording introduces an inflexible cap that could prevent local needs being satisfied on sustainable sites.	The wording "provision will be made for the delivery of up to 2,000 dwellings" is not intended to prevent, for example, suitable windfall or rural exception proposals towards the end of the plan period if 2,000 homes had already been delivered.
Rootes Trustees	Carter Jonas LLP	Not specified	It is unclear how individual Neighbourhood Forums could exercise their right to promote more development if the level of development the strategic policies themselves require is not specified. The Core Strategy should provide an indicative distribution of the number of dwellings to be provided at Hungerford, Lambourn and Pangbourne in subsequent neighbourhood plans or Site Allocation DPD's. The fifth bullet point of ADPP5 states that 'development will be focussed in Hungerford as the more sustainable rural service centre' in our view, it should read 'development will be focussed on Hungerford as the most sustainable rural service centre.	The issues around housing distribution were raised and discussed previously at the Hearing Sessions in June 2011. The Site Allocations and Delivery DPD will be prepared in conformity with the Core Strategy and will identify specific sites to accommodate the broad distribution of housing set out in ADPP5. This will provide the clarity needed should any Neighbourhood Forums want to exercise their right to promote more development in the AONB.
Banner Homes	Carter Jonas LLP	Not specified	The draft NPPF requires Neighbourhood Plans to be in general conformity with the strategic policies of the Local Plan. It also states that neighbourhoods will also have the power to propose more development than what is set in the strategic policies of the Local Plan. ADPP5 does not provide clear guidance about what proportion of the total housing distribution is to be accommodated by each Rural Service Centre.	The issues around housing distribution were raised and discussed previously at the Hearing Sessions in June 2011. The Site Allocations and Delivery DPD will be prepared in conformity with the Core Strategy and will identify specific sites to accommodate the broad distribution of housing set out in ADPP5. This will provide the clarity needed should any Neighbourhood Forums want to exercise their right to promote

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			Neighbourhood Plans will therefore have difficulty in making decisions that will lead to the delivery of the total amount of housing required. The Core Strategy should provide an indicative distribution of the number of dwellings to be provided in subsequent neighbourhood plans or site allocation DPDs. The fifth bullet point of ADPP5 should be amended to read 'development will be focused on Hungerford as the most sustainable location'.	more development in the AONB.
The East Kennet Valley				
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	These representations should be read in conjunction with our representations in respect of New Policy CS9a, Area Delivery Plan Policy 1, Area Delivery Plan Policy 6 and the Sustainability Appraisal. One of the main points of the objections is that insufficient consideration has been given to development at Tadley because the town itself lies within both a different District (Basingstoke & Deane) and in a different county (Hampshire). Paragraphs 44 to 47of the draft NPPF place a duty on local authorities to cooperate with neighbouring authorities. This cooperation has clearly not occurred in the case of development to the north of Tadley and, for that reason, the Core Strategy is considered to be unsound. Land to the north of Tadley should be identified either as a location for strategic development and/or Tadley	Policy CS9a deals with a unique situation which exists in this area regarding the AWE sites and the level of development that will be permitted. The Settlement Hierarchy Topic Paper (2010) sets out the background research and evidence to support the development of the settlement hierarchy for the LDF. The consideration of proximity to Tadley was a consideration in the settlement hierarchy methodology; however Tadley is located outside the District boundary. Though cross boundary working takes place and is particularly important in this area, it is for Basingstoke and Deane Borough Council to assess the role and function of Tadley in consultation with the Borough's residents. The potential strategic sites have been through various stages of appraisal throughout the development of the Core Strategy. Paragraph 4.4 of the Strategic Sites SA Policy Paper explains why the Silchester Road, Tadley site was eliminated from the consideration of strategic sites. Any potential allocation would need to be considered in the Site

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			should be included within the list of Rural Service Centres in Area Delivery Plan Policy 1.	Allocations and Delivery DPD, in co-operation with Basingstoke and Deane BC and taking account of development plan policies in Basingstoke and Deane and of Policy CS9a. Paragraphs 2.31 and 2.31d of the Core Strategy Background and Challenges section, states that "A cross-border working group exists between West Berkshire Council, Hampshire County Council and Basingstoke and Deane Borough Council on areas of common concern..."
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to: - Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents; - Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need; - Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually	The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			constrained economic growth; - Recognise the relationship between housing and other forms of development- particularly employment; - Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional relationship with Reading; and - Comply with the objectives, principles and policies of the NPPF especially as it fails to promote a presumption in favour of development.	preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base. The detailed points raised by Pegasus Planning and the Council's response are set out in an Appendix H.
Delivering New Homes and Retaining the Housing Stock				
Croudace Strategic Ltd	Boyer Planning Ltd	No	In our view the CS does not go far enough to meet the requirement of the NPPF. We recommend that there is a planned over supply of sites, with a number of smaller sites brought forward at the beginning of the plan period to benefit the current market, meet local need and potentially reduce the number of applications which the Council has not planned for. The expectation of the NPPF is that every effort should be made to drive forward the potential housing development, and that if the numbers of dwellings from identified sites through this plan making process exceed 11,000, this should be encouraged. The timeframe for the validity of the plan should be extended to 2027 in order to maintain a strategy for the District for the next 15 years. In line with this, an additional years' supply of housing should be added onto the baseline housing target; increasing the figure	The question of the housing requirement has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council acknowledges that evidence of need and projections of population growth indicate that the planned housing provision may not meet all projected requirements. In light of the District's significant constraints, including historic and landscape character, AONB, floodplain, infrastructure provision and issues relating to proximity to AWE establishments, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			to 11,200. We maintain that the SA has shown that a baseline figure of 11,000 would cause no additional harm, and therefore would support an increase of the housing figure to 11,700, taking into account both of the above points.	In respect of adding an additional year of housing supply, this issue is covered in FEPFC15 which states that pending any review of housing numbers, an annual average net additional dwelling requirement of 525 dwellings per annum will be carried forward beyond 2026.
Home Builders Federation		Not specified	Since migration to the UK has not declined, and the South East is still experiencing strong inward-migration from elsewhere in the UK, the inner-migration pressures on West Berkshire are only likely to increase. It is important to note that the draft NPPF requires the housing requirement to take account of the migration change. The Council is clearly planning for recession rather than for growth it is at odds with the stated aims of the Government in national planning policy. The housing requirement set does not satisfy the objective of the draft NPPF to increase significantly the delivery of new housing (paragraph 107) by meeting the full requirements identified in the SHMA and meeting the household projections. The reference in paragraph 5.2 to 'in-built flexibility to meet contingencies' does not provide the industry with any reassurance that the strategy will be sufficiently responsive to changing circumstances.	The question of the housing requirement has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council acknowledges that evidence of need and projections of population growth indicate that the planned housing provision may not meet all projected requirements. Demographic forecasts through to 2026 have contributed to the formulation of the housing requirement. They are, however, only one element to take into account in the preparation of the DPD. In light of the District's significant constraints, including historic and landscape character, AONB, floodplain, infrastructure provision and issues relating to proximity to AWE establishments, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable. The word approximately does provide some flexibility for more homes than stated in the ADPP policies. Work on the Site

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			Instead we would recommend that the core strategy refers to a minimum of 10,500 homes. This would provide the right kind of flexibility.	Allocations and Delivery DPD will lead to more precise allocations to the spatial areas. The housing numbers in the ADPP policies are not ceilings and FEPFC11 to Policy CS1 makes it clear that provision will be made for the delivery of at least 10,500 additional dwellings.
Sandleford Partnership	White Young Green	Not specified	In terms of housing provision, the Council have undertaken a detailed and wide ranging SHLAA that which has looked at sites in both the urban areas and wider countryside and examined both brownfield and greenfield sites. This document has objectively looked at the sites constraints and opportunities and whether sites are available and deliverable. This comprehensive has not introduced a 'false' ceiling in terms of examining appropriate development sites. The result is a comprehensive document which produces a range of brownfield and greenfield sites that could provide appropriate development sites. It is considered that the Council and its submission Core Strategy have been proactive in supporting and promoting sustainable development opportunities.	Comment noted. No response required.
Great Auclum Estate	Barton Willmore	No	The draft NPPF makes clear that Local Plans should ensure that objectively assessed housing (and other) development needs are met in full unless the adverse impacts of achieving this objective would "significantly and demonstrably outweigh the benefits" No evidence has been presented by WBC which supports their subsequent claim that a higher level of housing would result in unacceptable environmental impacts.	In light of the District's significant constraints, including historic and landscape character, AONB, and floodplain, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable. This housing figure has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
				needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. A higher level of housing was tested through the SA. The option of delivering above the RSS requirement was appraised as the least sustainable option.
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	Representations relate to CS1 in general and paragraphs 5.1, 5.1a, 5.1b, 5.1c and 5.1e in particular Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to: - Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents; - Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need; - Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually	The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF. The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the

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			constrained economic growth; - Recognise the relationship between housing and other forms of development- particularly employment; - Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional relationship with Reading; and - Comply with the objectives, principles and policies of the NPPF especially as it fails to promote a presumption in favour of development.	results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base. The detailed points raised by Pegasus Planning and the Council's response are set out in Appendix H.
Mrs Karen Gillam		No	The core strategy seems to imply commitment by WBC to develop previously developed land which is in accordance with the National Planning Policy. However, the council has considerably underestimated the number of houses that can be accommodated in Newbury, only allocating approximately 1000. By taking into account proper use of mixed use sites such as Parkway, Faraday Plaza (approved) and Market Street re-development as a 'broad location' for a 'strategic site' the approx. 5400 home quota for Newbury can be fulfilled with those homes already built or committed. This would avoid the need to build on Sandleford Park, a greenfield site, disrupting the habitat of ancient woodland and causing gridlock in south Newbury with potentially a further 3,000 cars in an area which is already congest considerably during peak periods and unable to sustain development. Policy CS4 should be deleted.	No change required. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. The mixed use sites at Parkway and Faraday Plaza are already included within the five year housing supply and the Market Street area has an adopted SPD for mixed residential led development. Appendix B to the Core Strategy shows that the requirement can not be met from homes already built or committed.
Gladman Developments		Not specified	Meeting the housing needs of West Berkshire through an informed housing target is fundamental to securing	This housing figure has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes,

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Ltd			growth in accordance with the NPPF. Policy CS1 is not considered to be sound as there is not a strong evidence base and therefore robust justification for the housing target promoted for the District. Policy CS1 must include for past under delivery alongside the objective assessment of future needs in order to determine the full requirements for market and affordable housing. Housing targets should be treated as a minimum. The Local Authority needs to positively manage growth and grant more planning permissions in order to meet housing need. If the Local Authority identify through annual monitoring that there is a shortfall, additional land would have to be identified to prevent the housing strategy being compromised. A Contingency Policy should be included within the Core Strategy in order to provide for and manage the delivery of housing during the plan period. The Core Strategy should be realistic about the proportion of brownfield development to be delivered during the plan period. Brownfield sites should not be released at all costs. Therefore, a brownfield first approach can only be	though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision. In light of the District's significant constraints, including historic and landscape character, AONB, and floodplain, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable. The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Planning for long term housing provision can not be exact but the Council does not feel it is appropriate to specify a ceiling. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes.

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			adopted where sites are fully compliant with policy and sustainable. The current economic climate is one of the many constraints associated with developing brownfield land. It will take some time before substantial levels of brownfield development becomes commercially attractive and viable. (see full rep for reasoned justification)	
Sandleford Strategic Site Allocation				
Mr Bryan Harper		No	The media release on the draft NPPF noted that in respect of sustainable transport that Local Authorities should seek to ensure good access to high quality local public transport for new developments, with priority given to cyclists and pedestrians. Wherever possible, key facilities essential to local life should be within walking distance of most properties. It is difficult to see how the choice of Sandleford meets this objective. The site is at the top of a long hill which will prevent most people from cycling. Most Sandleford residents will be situated further away from the town centre making the car a preferred choice of transport. The layout of the site as a cul de sac encourages the use of the car. The site is also just off one of the busiest routes through Newbury. Remove policy CS4 from the Core Strategy, and replace with brownfield mixed use developments in and around Newbury removing the protection to office buildings and employment land.	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within

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				Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Mr Timothy Goldsack		No	The media release on the draft NPPF noted in respect of sustainable transport that local authorities should seek to ensure good access to high quality public transport for new developments with priority given to cyclists and pedestrians. Key facilities essential to local life should be within walking distance of most properties. The proposed site at Sandleford is along way from Newbury town centre, and without good cycleway access. Even with access, the hill and distance would nonetheless deter cyclists. Congestion and pollution would be exacerbated by the development making use of Monks Lane and the A339. Instead of breaking in to greenfield pasture, place more emphasis on the re-use of brownfield sites where transport to and from work/school/shops can be made by foot or bike.	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes.
Mrs Alison Sloan		No	The media release on the draft NPPF noted that in respect of sustainable transport that Local Authorities should seek to ensure good access to high quality local public transport for new developments, with priority given to cyclists and pedestrians. Wherever possible, key facilities essential to local life should be	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at

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			within walking distance of most properties. It is difficult to see how the choice of Sandleford meets this objective. The site is at the top of a long hill which will prevent most people from cycling. Most Sandleford residents will be situated further away from the town centre making the car a preferred choice of transport. The layout of the site as a cul de sac encourages the use of the car. The site is also just off one of the busiest routes through Newbury. Remove policy CS4 from the Core Strategy, and replace with brownfield mixed use developments in and around Newbury removing the protection to office buildings and employment land.	http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Mr Gerald Walker		No	The media release on the draft NPPF noted that in respect of sustainable transport that Local Authorities should seek to ensure good access to high quality local public transport for new developments, with priority given to cyclists and pedestrians. It encourages decision-makers to provide charging points for electric cars and other low emission vehicles. Wherever possible, key facilities essential to local life such as schools and shops should be within walking distance of most properties.	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of

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			Irrespective of the number of cycle tracks and footpaths that may be provided, the majority of the journeys undertaken by the occupants of this development will be by car. There are already very few cyclists on Andover Road hill, and the Sandleford site is some distance from the town centre. It is therefore difficult to see how the choice of Sandleford meets with the Governments objectives. Remove policy CS4 from the Core Strategy, and replace with brownfield mixed use developments in and around Newbury removing the protection to office buildings and employment land.	the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Say No to Sandleford		No	The media release on the draft NPPF in respect of sustainable transport noted that local authorities should seek to ensure good access to high quality public transport for new developments with priority given to cyclists and pedestrians. Wherever possible, key facilities should be located within walking distance of most properties. Difficult to see how Sandleford meets this objective. Long hill will prevent people from cycling - very few cyclists already on Andover Road hill. The bulk of Sandleford residents will be situated further away from the town, and this plus the structure of the site as a cul de sac will encourage car use. Pollution and congestion unlikely to be reduced because the site is alongside the busiest routes through Newbury. Levels	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family

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			already high here. Remove CS4 from the core strategy and replace with brownfield mixed use developments in and around Newbury removing the protection to office buildings and employment land.	homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Sandleford Partnership	White Young Green	Yes	This policy is considered sound in relation to the draft NPPF. The proposed strategic allocation of Sandleford in the Core Strategy for 2000 dwellings provides flexibility in terms of housing numbers with 1000 proposed in the plan period and a further 1000 post plan period with the opportunity for the second 1000 homes to come forward earlier in the plan period if necessary. It is considered this approach is reflective of the positive and pro-active approach to growth being taken by the Council and helps provide certainty and continuity for future growth. This further emphasises the fact that the Core Strategy is consistent with the requirements of the draft NPPF and promotes sustainable development, which can provide community and infrastructure benefits, and provide long term certainty.	Comment noted. No response required.
Mr Paul Day		No	This policy is not considered to be sound in relation to the NPPF as it is not consistent with national policy.	Attachment to the representation does not raise any issues which relate to the NPPF.

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			NPPF states that the Government is committed to cutting down pollution and congestion through the use of public transport. Local authorities should seek to ensure good access to high quality local public transport for new developments with priority to pedestrians and cyclists. ...Wherever possible key facilities essential to local life such as schools should be in walking distance of most properties. It is difficult to see how the choice of Sandleford meets this policy objective. Regardless of how many cycle routes are put in place the position of the site at the top of a long hill will prevent most people from cycling anywhere. Moreover the structure of the site as a long cul de sac encourages the use of the car for all but the most basic necessities. This along the busiest routes through Newbury which means that they will also fail to meet the objective of cutting down pollution and congestion. Indeed with these latter objectives Sandleford will add to the problems of pollution in areas where levels are already unacceptably high. Remove CS4 from the core strategy and replace with brownfield mixed use developments in and around Newbury removing the protection to office buildings and employment land. Rep has an attachment.	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to demonstrate how they improve travel choice and reduce car use. The Transport Assessment set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at http://www.westberks.gov.uk/index.aspx?articleid=16893. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Julian Swift-Hook		No	The media release on the draft NPPF noted that in respect of sustainable transport that Local Authorities	Policy CS14 is the overarching transport policy for the Core Strategy – and all planning applications will need to

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			should seek to ensure good access to high quality local public transport for new developments, with priority given to cyclists and pedestrians. Wherever possible, key facilities essential to local life should be within walking distance of most properties. It is difficult to see how the choice of Sandleford meets this objective. The site is at the top of a long hill which will prevent most people from cycling. Most Sandleford residents will be situated further away from the town centre making the car a preferred choice of transport. The layout of the site as a cul de sac encourages the use of the car. The site is also just off one of the busiest routes through Newbury. The proposals will add significantly to the problems of air pollution in areas where levels have already been identified as unacceptably high. Remove policy CS4 from the Core Strategy, and re-evaluate the remainder of the Core Strategy in light of the emerging NPPF, with particular emphasis on supporting residential-led mixed-use development on pre-used and regeneration sites, especially in a broad location on the eastern periphery of the town centre.	demonstrate how they improve travel choice and reduce car use. Both the Core Strategy and the Local Transport Plan 3 (LTP3) http://www.westberks.gov.uk/CHttpHandler.ashx?id=27344&p=0 encourage modal shift and the infrastructure will be put in place for the Sandleford development to enable this. Additionally there will be a Travel Plan for the site which will include cycle training. Policy LTPA2 of LTP3 sets out the measures that will be put in place to encourage increasing cycling in West Berkshire. This is supported by the Council's Active Travel Strategy and the Smarter Choices Strategy. The Transport Assessment Phase 4 set out specific information on the transport infrastructure to deliver the Sandleford and Racecourse developments and can be found at: http://www.westberks.gov.uk/CHttpHandler.ashx?id=24284&p=0 Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family

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				homes. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.
Housing Type and Mix				
Gladman Developments Ltd		Not specified	We support the Local Authority's approach to determining the appropriate housing mix for individual sites that comes forward. The proposed approach endorses the NPPF aspirations for an evidenced based approach to plan making and the principal of delivering sustainable development. As stated by Policy CS5 the mix for individual sites should have regard to: - The character of the surrounding area; - The accessibility of the location and availability of existing and proposed local services, facilities and infrastructure; - The evidence of housing need from Housing Market Assessments and other relevant evidence sources.	The sections of the representation regarding housing mix and consultation on Local Plan are noted. No change required. Issues regarding density and viability are addressed in the SHMA and the SHLAA, which is regularly updated. Both are prepared in consultation with the development industry. The policy is intended to be flexible in relation to density but with the principle that developments make efficient use of land, taking into consideration character of the area and its surroundings and public transport provision.

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			The approach taken by Policy CS5 to ensuring the efficient use of land through appropriate densities of development based on levels of accessibility, provision of local services and facilities as well as the character of the surrounding area is supported. However, to make this part of Policy CS5 effective it is recommended that density should also be defined in context with the Strategic Housing Market Assessment (SHMA) and marketability advice provided by house builders. The NPPF notes that Local Plans should be realistic and encourages public consultation. Housing density policy must be capable of being applied flexibly in order to respond to the market and support the wider objectives of the Core Strategy. Rep has an attachment.	
Affordable Housing				
Gladman Developments Ltd		Not specified	It is recommended that Policy CS7 specifies a 30% affordable housing target for greenfield and brownfield sites of 15 dwellings or more. We do not support a higher affordable housing requirement of 40% for greenfield sites or an 'overall' target of 35% as specified by paragraph 5.21. It is not a commercially realistic target that will enable developments to come forward and deliver affordable housing. To have such a high policy requirement is not achievable given that land values are unlikely to return to recent levels in the short term and that viability issues will continue to	The level of affordable housing set out within policy CS7 is evidenced and supported by an Economic Viability Assessment (EVA; 2007 & 2009) - See CD09/17 & CD09/18. These issues have been debated at the hearings into the Core Strategy. The reasoned justification for the Council's policy approach is also set out within the Examination Statement on Main Matter 4: Meeting the housing needs of the community; Sub Matter: Affordable Housing (9 November 2010). This statement is available on the Council's website:

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			affect many sites. The 40% affordable housing target for greenfield sites is not considered realistic or viable given past delivery rates We support the Core Strategy's approach towards the issue of viability. If schemes are unable to deliver the full affordable housing requirement robust viability evidence needs to be submitted to demonstrate why this is the case. PPS3 promotes monitoring the delivery of market housing over a 5 year period. Given the recognised need for affordable housing it is recommended that delivery is monitored in the same way. The Core Strategy needs to identify the quantum of affordable housing to be delivered during the plan period. From this an annual target needs to be established in order to monitor annual delivery. The monitoring process should also show what sites have been allocated to accommodate affordable housing and how affordable housing is being delivered. In accordance with NPPF [1] fully delivering affordable housing in line with local policy creates sustainable developments that provide a wide choice of housing to meet the needs of the whole community in terms of tenure and price range. Therefore, such schemes should be supported by each Local Authority and considered favourably in contrast to those that fail to deliver as much or any affordable housing in circumstances where it is not possible to demonstrate	http://www.westberks.gov.uk/index.aspx?articleid=21240. Support noted with regard to approach to viability. The Monitoring Framework of the Core Strategy (Section 6) sets out how the Council will monitor each policy to ensure delivery. The Annual Monitoring Report will be the tool used to report progress and effectiveness of policies.

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			a 5 year supply of affordable housing. Representation provided as an attachment.	
AWE Aldermaston and AWE Burghfield				
Bovis Homes Ltd (& J A Pye)	Bell Cornwell Partnership	No	It is considered that this policy is unsound in relation to the draft NPPF as it is neither justified, effective or consistent with national policy. These representations should be read in conjunction with our representations in respect of New Policy CS9a, Area Delivery Plan Policy 1, Area Delivery Plan Policy 6 and the Sustainability Appraisal. One of the main points of the objections is that insufficient consideration has been given to development at Tadley because the town itself lies within both a different District (Basingstoke & Deane) and in a different county (Hampshire). Paragraphs 44 to 47of the draft NPPF place a duty on local authorities to cooperate with neighbouring authorities. This cooperation has clearly not occurred in the case of development to the north of Tadley and, for that reason, the Core Strategy is considered to be unsound. Land to the north of Tadley should be identified either as a location for strategic development and/or Tadley should be included within the list of Rural Service Centres in Area Delivery Plan Policy 1.	Paragraphs 2.31 and 2.31d of the Core Strategy Background and Challenges section, states that "A cross-border working group exists between West Berkshire Council, Hampshire County Council and Basingstoke and Dean Borough Council on areas of common concern..." The Settlement Hierarchy Topic Paper (2010) sets out the background research and evidence to support the development of the settlement hierarchy for the LDF. The consideration of proximity to Tadley was a consideration in the settlement hierarchy methodology; however Tadley is located outside the District boundary. Though cross boundary working takes place and is particularly important in this area, it is for Basingstoke and Deane Borough Council to assess the role and function of Tadley in consultation with the Borough's residents. The potential strategic sites have been through various stages of appraisal throughout the development of the Core Strategy. Paragraph 4.4 of the Strategic Sites SA Policy Paper explains why the Silchester Road, Tadley site was eliminated from the consideration of strategic sites. It should also be noted that a unique situation exists in this area regarding the AWE sites and the level of development that will be permitted. See policy CS9a

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Employment and the Economy				
Miss Airlie Dyson		No	The draft NPPF promotes the use of employment land for mixed residential and employment development in addition to the conversion of employment floorspace for residential use. The wording on page 14 of the FEPFC19 is not consistent with the draft NPPF: "In making allocation for residential development...any proposed location will be considered". Page 5 para 19 – planning policies and decision should make effective use of land, promote mixed use developments ….enable reuse of existing resources, such as through conversion of existing buildings'. Page 19 para 75 – planning policies should avoid the long term protection of employment land or floorspace'. Page 19 para 76 'recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential developments on appropriate sites'. I think the Council should stop protecting employment land and floorspace and promote these areas for mixed residential and employments as directed by the NPPF. This will reduce the need for large strategic sites on land at present reserved for nature.	No change required. With regard to the stated references within the NPPF policy CS10 does encourage more efficient use of existing sites and premises and promotes the intensification, redevelopment and upgrade of existing, vacant and/or derelict employment sites and premises for business development. The Core Strategy carries forward the Protected Employment Area designation to ensure the health of the local economy is maintained. This designation will be reviewed as part of the Site Allocations and Delivery DPD to ensure the areas remain fit for purpose and continue to be required to support the local economy. The Council recognise the importance of residential developments in maintaining the vitality of centres, but it is also recognised that such developments need to be balanced with the provision of employment. Policy CS10 does allow for non town centre uses, such as residential, which involve the loss of office floorspace within existing centres, provided it can be demonstrated that such schemes would maintain the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre. The Council recognise the importance of residential developments in maintaining vibrant places, but it is also recognised that such developments need to be balanced with

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
				the provision of employment.
Vodafone Ltd	Colliers International	No	Policy CS10 is indeterminate in terms of the Vodafone site. The draft NPPF states that policies should be based upon a presumption in favour of sustainable development and how the presumption will be applied locally. Furthermore, plans should set out clear guidance on what will/will not be permitted and where. Policy CS10 is indeterminate in terms of development at the Vodafone Headquarters site in that no clear vision is provided for the site. Specific mention should be made in the policy regarding the Vodafone site alternatively there should be a bespoke policy for the site. This fails the test in the draft NPPF that policies must be positively prepared. CS10 does not appropriately consider the change in emphasis in national policy on the location of office development, or the relaxation on the protection of employment land or floorspace, which is expressed in the draft NPPF. Policy CS10 and the explanatory text should be appropriately amended to reflect the NPPF which seeks: -To acknowledge that office development is in general appropriate in other locations providing it is consistent with the NPPF criteria; -Remove the sequential approach to offices; -To ensure that planning polices avoid the long term	No change required. Policy CS10 clearly states that business development will be supported on existing employment sites, particularly sites such as Vodafone. Such sites will be assessed further through the Site Allocations and Delivery DPD to determine whether they should be designated as a Protected Employment Area or an alternative bespoke designation. The policy clearly sets out the Council's intentions for the Vodafone site and other similar employment sites within West Berkshire. The approach to offices as set out within policy CS10 has been debated at length at the hearings into the Core Strategy and the sequential approach was included at the request of the Inspector. As set out in 5.45o Protected Employment Areas have been designated through the Local Plan for B class uses to ensure sufficient sites are provided in suitable locations to foster business development and promote sustainable economic growth across the District. A review of these areas will take place as part of the Site Allocations and Delivery DPD. Policy CS10 does allow for employment generating uses other then B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.

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			protection of employment land or floorspace; and that -Applications for alternative uses of designated land or buildings for employment purposes should be treated on their merits having regard to market signals and the relative need for different uses. If the changes are not made, policy ECON1 should not be deleted from Appendix E.	
Town Centres				
Vodafone Ltd	Colliers International	No	Policy CS12 does not appropriately consider the change in emphasis of national policy (draft NPPF) on the location of office development (B1 office uses are not regarded as town centre type uses as the draft NPPF requires only retail and leisure uses to have a sequential and impact test undertaken). Policy CS12 should therefore be amended to remove the reference to PPS4 for testing for B1 offices to reflect national guidance.	No change required. Following the debate over the content of the draft NPPF at a national level (the Government's Select Committee has raised areas that the NPPF will need to consider) it can be considered that the weight placed on the document has reduced since it was first published. As such, the final version is likely to be different. The approach to offices as set out within policy CS10 has been debated at length at the hearings into the Core Strategy and the sequential approach was included at the request of the Inspector.
Renewable, Low and Zero Carbon Energy				
Renewable UK		Not specified	We support the spatial vision, however would suggest that instead of a 'full role' which is not clearly worded, the Strategy state 'will reduce carbon emissions as much as possible through increased generation of renewable energy..'.	The suggested word change does not improve the meaning of the Spatial Vision. Policy CS16 relates specifically to renewable energy generation. Sustainable development is defined by the draft NPPF, which

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			RenewableUK considers that there should be core policy on renewable energy. While increased generation from renewables is part of the Core Strategy vision, this provision does not transpire very strongly it its policies. CS16 requires major development to achieve reductions in carbon dioxide emissions from renewable energy generation and that the level of generation will be reported in the AMR is supported. The core strategy should define sustainable development and include the presumption in favour of sustainable development in the NPPF. While infrastructure requirements are provided for in the Core Strategy, nationally significant infrastructure currently is not. Secure radical reductions in greenhouse gases; active support for renewable and low-carbon energy infrastructure . This active support for renewable energy infrastructure should in our view be strengthened in the Core Strategy.	may be subject to change. The Inspector removed the introduction of the Code for Sustainable Homes and BREEAM requirement from policy CS16 because he did not agree with the district wide application of the policy or the evidence the Council had submitted in support of this policy.
Gladman Developments Ltd		Not specified	Renewable, Low and Zero Carbon Energy' would be more appropriately covered by Building Regulations. This policy will deter development. In order for Policy CS16 to be effective and sound it should encourage the delivery of renewable energy	Renewable, Low and Zero Carbon Energy is intended to act in unison with Part L of the Building Regulations which covers the energy efficiency of buildings.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			through a generic policy approach that has a positive strategy to facilitate the implementation of sustainable design and energy initiatives where appropriate and viable.	
Monitoring Framework				
Gladman Developments Ltd		Not specified	The NPPF notes that Local Plans should include clear arrangements for monitoring and reporting the annual delivery of market and affordable housing. Whilst we support the intention to prepare an Annual Monitoring Report we suggest that housing supply would be more appropriately reported by a Housing Delivery Statement. The document would show the delivery of market and affordable housing in context with the identified 6 year supply on a site by site basis. It is considered that a Housing Delivery Statement would be a more robust tool to monitor the provision of housing. Regular monitoring and review of housing delivery through an annual Housing Delivery Statement is key to achieving NPPF aspirations of increasing the supply of housing to meet the needs of present and future generations. Monitoring is also a fundamental element of successfully achieving the Core Strategy's vision of meeting housing need and providing a range of employment land and premises in the right locations at the right time. It will also enable the recommended Contingency Policy to be implemented where appropriate and allow West Berkshire Council to bring forward suitable alternative / additional sites as soon as possible should the monitoring process identify a	No requirement to produce a Housing Delivery Statement but issues of housing delivery is covered in the Annual Monitoring Report (AMR). Monitoring is an important aspect of planning policy. Indeed, an Annual Monitoring Report has been published by the Council every December since 2005. In line with the requirements of PPS3, since 2007 the Council has produced details of its five year housing land supply on an annual basis, as an annex to the AMR. The supporting text to each policy of the Core Strategy contains a section on delivery and monitoring.

Consultee	Agent	Soundness	Summary of Consultee Comment	Council Response
			deficit in supply. The Statement should be published and made available for public scrutiny along with the data used to inform the document. Where the Housing Delivery Statement identifies under delivery the Local Authority should take forward the recommended Contingency Policy as set out in the enclosed representation to Policy CS1. Adopting a Contingency Policy is imperative in order to ensure a continuous supply of housing during the plan period. Rep has an attachment.	

Appendices E - H

These appendices contain the more detailed and longer submissions made with respect to Consultation 1 the Implications of revisions to the Sustainability Appraisal / Strategic Environmental Assessment for the Core Strategy.

Each appendix is preceded with a short introductory page which details what the representation concerns and the proposed response from the Council.

All page numbers quoted in **red (at the top of the page)** relate to just Appendices E – H.

E **Representations by West Berkshire Liberal Democrat Shadow Executive (pages 3 – 26)**

(i) Sandleford How it Went Wrong in 2009 (page 4 – 7)

Officer response (page 8 – 13)

(ii) Appendix 8 - Re-assessment of Newbury Options in SA (page 14 – 17)

Officer response (page 18 – 21)

(iii) Newbury's New Housing If not Sandleford Park, then where? (page 22 – 23)

Officer response (24 – 25)

F **Representations by Say No to Sandleford (SNTS) (page 27 – 64)**

Officer response (page 28 - 64)

(i) SNTS appraisal of Strategic Sites SA/SEA (page 29)

Officer overall summary response (page 29 – 30)

SNTS Tabular Appraisal (SA Key Issues) (page 31 – 44)

Officer response to Tabular Appraisal (page 45 – 50)

SNTS Tabular response to Core Strategy (page 51 – 53)

Officer response to Tabular response to Core Strategy (page 54 – 56)

(ii) SNTS representation on soundness (page 57)

Officer response (page 57)

(iii) Additional SNTS representations (page 58)

G **Representations by The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement (North Newbury) to Policy CS4**

Fairhurst Estate response to CS4 inlight of changes to SA/SEA (page 65)

Officer response (page 65 – 68)

H **Representation by Pegasus Planning Group on behalf of Henry Davidson Developments Ltd and TA Saunders Trustees Representation to Core Strategy**

Pegasus Planning response to Core Strategy (page 69 – 79)

Officer response (page 70 – 79)

Appendix E

Representation by West Berkshire Liberal Democrat Shadow Executive

(i) Sandleford: How it Went Wrong in 2009

Document explains how the scoring system for strategic sites was changed: who suggested the change, by whom and when it was agreed, and what the effect of the change was on the Council's decision to recommend Sandleford Park.

Reproduced in full (page 4 – 7)

Officer proposed Council response to the above document providing corrections and amplification as it is considered that the document is misleading. It is suggested that both are read together.
(page 8 – 13)

(ii) Appendix 8 - Re-assessment of Newbury Options in SA

Document provides an assessment of the impact of a re-appraisal of the SA scores and a re-interpretation of the site characteristics by the respondent.

Reproduced in full (page 14 – 17)

Officer proposed Council response to the above document providing corrections and amplifications as it is considered that the document is both confusing and misleading. (page 18 – 21)

(iii) Newbury's New Housing If not Sandleford Park, then where?

Document suggests an assessment of how Newbury's new housing could be provided without having to allocate Sandleford

Reproduced in full (page 22 – 23)

Officer proposed Council response to the above document providing corrections and amplifications as it is considered that the document misleading. (page 24 – 25)

Sandleford: How it Went Wrong in 2009

This document explains how the scoring system for strategic sites was changed: who suggested the change, by whom and when it was agreed, and what the effect of the change was on the Council's decision to recommend Sandleford Park.

Prior to actively seeking bids from developers and landowners for strategic sized housing sites, in mid-2008 the Council devised a methodology for assessing them against sustainability criteria called sub-objectives. This methodology was taken through its Member-led Planning Task Group (PTG) and approved for a six-week informal consultation, ending 19th October 2008 (SA Site Selection Framework Policy Paper para.1.4). 11 promoted sites were scored against this Framework in early 2009 (Appendix 3 to that paper). Confusingly, they were also "appraised" using a less numeric system (++, +, O, -, - -) instead of numeric scores derived from weighting of sub-objectives (H/M/L).

This is the root of the confusion and many comments about how "the scoring system has changed". The story unfolds here (see CD09/48a in Core Documents List on the Council's Core Strategy Examination webpage), thanks to a Freedom of Information (FoI) Act request early this year. Unfortunately it is not available electronically, because the Council 'redacted' (blanked out) large parts of the normally CONFIDENTIAL minutes and agenda papers of the PTG meetings, which were unrelated to Core Strategy. CD09/48a covers the period Feb 09 to Dec 10.

Narrative

The 27 Feb 09 PTG agenda papers contain only an example Topic Paper, which was not related to strategic site selection. These Topic Papers were said by officers to "*produce an easier to use SA report*"! The agenda report did not include a list of what subjects they would cover, although Appendix B of the draft Sustainability Appraisal (in the agenda papers) was the (amended) Site Selection Framework, still with weighted score ranges. At this stage, as can still be seen in the latest version of the SA, Sandleford scored last of the 11 sites. Whilst 1.9 of the report says this is just "*part of the process for assessing the potential strategic sites*", nothing in the report said that the weighting - or the scoring in the Framework - would not remain in use as a major part of that process throughout.

All members of PTG (except Cllr Tony Vickers[1]) were present at the meeting. The officer who introduced the report (agenda item 4) on the emerging SA, in which the use of "*topic papers*" was explained, was asked for – and gave – a list of the papers, that did include strategic sites. Although "*members agreed with the methodology of the topic papers*" they asked "*to see a*

[1] Although one of two Lib Dems who have been members of PTG throughout the entire Core Strategy process (from June 2003), Cllr Dr Vickers (Member for Newbury Northcroft and a part-time lecturer at Kingston University School of Surveying and Planning) only became Opposition Planning Spokesman in May 2011. Prior to that Cllr Dr Royce Longton (Burghfield) led on Planning for the Lib Dems.

comprehensive summary of each to provide a scrutiny process" and for "*an explanation of the scoring system to be included at the top of the tables*".[2]

The **27 March 09 PTG** did not discuss the SA but concentrated on the draft Core Strategy (CS) itself: ***Options for the Future***. It simply stated in Policy CS7: "*identification of a broad location for future expansion of Newbury to the south at Sandleford*" for 2000 homes which "*could be seen as a reserve site*". Newbury Racecourse was the preferred option for "*Focus on Newbury*".

The minutes of 27/3/09 PTG are absent from the pack released under FoI request but it is clear there was need for an extra meeting on 9 April – before the Executive meeting to approve ***Options for the Future*** - because these minutes are in the agenda pack for the 1 May 09 meeting.

At the **9 April 09 PTG**, Cllr Vickers was present and agreed with other Members that we should consult on three 'reserve' sites in Newbury/Thatcham, in addition to Newbury Racecourse. Members said then "*scoring should be shown for all sites*" (i.e. in the consultation document). It is minuted that Cllr Vickers agreed to a reserve site because he "*did not want the LDF to be deemed unsound at Inquiry stage…The evidence was there for it* [i.e. a reserve site] *and it would only come forward if needed*."

Despite the fact that the PTG Members (as opposed to officers) clearly still regarded the scoring system as an important part of the evidence, "*officer interpretation*" hereafter increasingly seemed to replace (rather than supplement) the system that Members had not long before approved and which had been consulted upon. A significant degree of objectivity and transparency was lost in the process, which resulted in doubts over the reason for choosing Sandleford.

When the ***Options for the Future*** was approved for publication by Executive on **23 April 09**, no mention was made of the Strategic Sites Topic Paper or of the method of assessment of sites. It was emphasised that the Executive were not taking a view on the CS at this stage, let alone on the SA or its Topic Papers: they merely resolved to publish the document for consultation.

The Combined Strategic Sites Appraisal (Phase 1) Document, published alongside ***Options for the Future***, said "*the site selection process … cannot be a precise science*"[3]. It assessed the same 11 sites without appearing to use any objective scoring system at all.

The minutes reveal that the officer who led the CS work told the PTG at its last meeting (**1 May 09**) before this document was published that "*the SA and Topic Papers were intended for developers*". By implication, she was saying

[2] The latter appears in para. 3.12 of the Site Selection Framework Policy Paper of the SA. The former seems never to have been given to PTG, hence no Councillor scrutiny process was applied to the Site Selection Paper of the SA.

[3] Recruitment of senior Council officers and tendering of large contracts are also not "precise science", yet the systems used endeavour to maintain rigour, objectivity and audit trails. £1m decisions about Council money are not made in the way the Council have decided which landowner will be regarded as having put forward the most "sustainable" site – a £100m+ gift from the Planning Authority.

they are not intended for the general public or for Council Members. It appears that the Strategic Sites Topic Paper did not feature on a PTG agenda again until after the CS Submission in early 2010.

The results of the (non statutory) consultation on ***Options for the Future*** (from 22 May for 6 weeks) were presented to **PTG on 28 Aug 09**. The report said: "*several new sites*" promoted during the consultation period "*need to be assessed in the same way as the original 15 strategic sites*", implying the scoring system (with weighting) had not been completely cast aside. Nothing further seems to have been said or done about these new sites.

At the **25 Sep 09 PTG**, which neither Lib Dem Members were able to attend[4], the Council's "Response to Comments on Options for the Future" was presented. It proposed (p.41) "*that an additional strategic allocation at Sandleford is included within the CS*", for 2000 homes, of which 1500 would be in the Plan Period. The minutes record that "*Members were supportive*" of this but the agenda report did not suggest any decision or recommendation to Exective would be made. Despite this, members of the ruling Party have been told – and it has been publicly announced - that "*a unanimous decision was made to select Sandleford*" at this meeting.

The minutes record it was said "*topic papers will be constantly updated throughout the CS preparation*" and that "*some policies, in particular the strategic sites, are still to be firmed up and so the [SA] will be published at the submission stage*". [It was not, which is why the Inspector called for its revision and re-publication in July 11.]

A section in this report was specifically about SA Responses (pp.71-72). It noted that "*most related to the methodology used for assessing the potential strategic sites and the scores given to those sites*". It also noted that "*a comment … sought better links from the CS to the SA*", in response to which officers said they would also "*improve links from the SA to the CS*".

Before the **30 Oct 09 PTG** meeting, a revised draft CS (but no revised SA or topic papers) was presented for discussion by Members. The papers released do not include the minutes of this meeting, nor the papers for the next meeting on **27 Nov 09**. The covering report notes that SE Region had reduced the overall housing target by 500, so the Sandleford allocation for the Plan Period also reduced, to 1000, i.e. it was not needed as much as had appeared.

At the **15 Dec 09 PTG** meeting, another revision of the CS was presented – again without an accompanying SA or revised Strategic Sites Topic Paper. The 29 Jan 10 PTG discussed the method of consulting on the Submission CS, not the document itself. At the 19 Feb 10 PTG the full list of Proposed CS Submission (formal) consultation documents was outlined (but not presented for discussion in detail). The report notes under SA/SEA that "*the assessment of the strategic sites which was carried out as part of the process of site selection does not need to be revised through the SA/SEA. However*

[4] The Lib Dem Group has had two members of PTG throughout and both councillors received, read and commented on agenda papers. However the Group's policy was normally to merely ensure that at least one member attended, especially as the timing of PTG meetings always clashed with its own Shadow Executive meetings on a Friday morning. It is not known why neither Lib Dem attended the Sep 09 meeting. Cllr Vickers attended a cousin's wedding that day.

the Combined Strategic Housing Sites document has been updated to demonstrate how the sites included within Options for the Future" were then taken forward.

By the time the Phase 2 document was published, in July 2010, officers were claiming (para 2.2 of amended Sept 2010 version):-

"*However, this approach* [i.e. sustainability appraisal of sites by weighted scoring] *could not be taken in a consistent way at any stage during the Core Strategy process due to the differing levels of information available for each site. Therefore the most appropriate way this can be considered is by officer interpretation and analysis of the evidence base, rather than solely relying on the sustainability appraisal*." [5]

Conclusion

It was only when, in September 2009, Sandleford was 'promoted' from being one of three reserve sites to being the preferred second strategic site, with a lower proportion of its housing actually needed during the plan period to 2026, that strong objections to this choice started to be made. And throughout this period, Members (let alone the public) had not had the SA brought to their attention at all (because "it is intended for developers") let alone that the Strategic Sites Policy Paper had been substantially amended and - under the new and less objective 'appraisal' system using 'officer interpretation' – somehow achieved a better result than the only two remaining sites that were under consideration.

It is therefore not surprising that other developers, promoting other sites, objected to the lack of Member involvement in the process and lack of transparency when the CS was finally published for formal consultation in early 2010. That is the main reason we now, in late 2011, are still debating the issue and why the CS is itself held up from being adopted, despite all the other sound policies it contains.

It is not possible to ascertain the underlying reasons why the Council (Members or Planners or both?) have persisted in promoting Sandleford. However using local knowledge and careful study of the geography of Newbury, it seems clear to many that **had the original scoring system continued to operate as a major part of the overall "sustainability appraisal" (in the true meaning of the phrase) then Sandleford would <u>not</u> be the preferred choice of most objective analysts**. We demonstrate this in our revision of "Appendix 8" of the Strategic Sites Policy Paper.

Cllr Dr Tony Vickers, Liberal Democrat Planning Spokesman, West Berkshire Council

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[5] This begs the question: Why not re-iterate the original weighted scoring approach (which had been approved by Members after a specific consultation for this purpose) whenever new information becomes available? Where information is unclear, a 'margin of error' could be used to indicate the range of possible scores that a site currently merited. This would enable the approved methodology to be retained - indeed improved upon - rather than abandoned on the whim of officers.

Council Response to:

Sandleford: How it went wrong in 2009 (Attachment to representation by West Berkshire Liberal Democrat Shadow Executive on policy CS4 in light of changes to the SA/SEA)

Many points within the above document require correction or amplification as they are considered misleading. Both the attached document and the Council Response should be read together:

Comments on Paragraphs 1 – 3
The opening paragraph in bold states that the scoring system was changed however this is not the case, the scoring system has not been changed.

In the second paragraph:
Options for Delivering Homes consultation published in November 2007 for 6 weeks also called for sites to come forward. This was some 8 months prior to the mid-2008 put forward in the attached document.

The Site Selection Framework is a scoring methodology using the SA objectives and sub-objectives, the scoring criteria was devised as a way of assessing against the sub-objectives.

The Site Selection Framework was approved by Members for a four week period of informal consultation, not six. The Framework was amended in response to the consultation responses.

The Site Selection Framework SA Policy Paper states that the scoring of sites is the starting point for the site selection process. It goes on to say that the results of the assessment forms part of the Sustainability Appraisal of the options to be considered for the West Berkshire Core Strategy and informed the choice of sites presented at the Preferred Options stage. The assessment is a strategic level method for initially comparing sites on a consistent basis and other consideration are also taken into account in the final consideration of the sites.

The Site Selection Framework process was therefore taken forward within the Sustainability Appraisal which uses the SA Objectives and sub-objectives to appraise policy options, and ultimately the policies, in terms of potential significant environmental, social and economic impacts, in accordance with the SEA Directive. Members were presented with an example of how the SA would be carried out at the 27th February 2009 Planning Task Group and reminded that the Site Selection Framework was being used as part of the process for assessing the potential strategic sites and that the assessment forms part of the evidence to support the decision of which sites to take forward and those which were rejected at that stage. This approach has been clearly stated throughout the process so saying the sites were “confusingly” appraised is simply not the case. None of the Members attending the February 2009 PTG meeting ever sought clarification or stated they were confused, nor indeed did any Member during subsequent Task Group meetings in 2009, when there were many opportunities to do so.

It is not possible to carry the scoring framework forward in to the rest of the SA process to be applied to all policy options and emerging policies within the Core

Strategy. The Site Selection Framework is different to the remainder of the SA; it is unique to the Site Selection Framework and can only possibly apply to this Framework. The weighting can therefore only apply to the scoring criteria in the Site Selection Framework and not the rest of the SA (the rest of the SA assesses against the objectives and not criteria). The SA policy papers (initially called SA topic papers) cover all stages of the development of the Core Strategy and appraise all reasonable options and the emerging policies of the Core Strategy.

Comments on the Narrative
Paragraph 4:
The Site Selection Framework and its scoring system remain part of the SA/SEA.

Paragraphs 5 - 7:
Any Member unable to attend a PTG meeting could raise any issues/comments in advance through the Chairman or a substitute could be sent to the meeting as the papers had been sent in advance.

The footnote (no.2) to paragraph 5 states that a comprehensive summary of each topic paper was never taken to PTG therefore no councillor scrutiny process was applied to the Site Selection Paper of the SA. Paragraph 6 of the attached document goes on to state that the March 2009 meeting did not discuss the SA. The SA policy papers, Core Strategy topic papers and strategic housing sites appraisal document were provided for Members at the PTG meeting of the 27 March 2009 as a background document to Item 4, the draft Preferred Options Core Strategy, 'Options for the Future' consultation document. The minutes of the meeting show that the background papers were discussed.

The minutes of the 27th March 2009 meeting are included within the agenda for the 9th April 2009 meeting and are available to view within CD09/48A.

Paragraphs 8 and 9:
At the 9th April 2009 meeting Members were presented with the Combined Strategic Housing Sites Appraisal Document Phase 1 (a draft had already been seen at the March meeting of PTG). The minutes show that the main parts of the document were summarised for Members and a discussion took place on the rationale behind site identification and selection criteria. The minutes set out that the scoring of each site was discussed and listed and their merits or otherwise explained. The attached document's quoting from the minutes fails to go on to state that "Liz Alexander [officers] advised that it would be possible to show how sites had been assessed and then the preferred options and explain how those preferred options had been decided on but that other sites had also been looked at."

The claim that the scoring system was no longer regarded as an important part of the evidence is not correct. The scoring from the Site Selection Framework was always intended as part of the site selection process and this has been made clear to Members from the start of the site selection process, with the purpose of the Site Selection Framework as an initial high level assessment, and the shortcomings of it, explained. The scoring has informed the progress of the site consideration through the Core Strategy and SA process and was an important tool to provide an initial broad comparison of sites highlighting issues where relevant. It therefore follows that "officer interpretation" and "a significant degree of objectivity and transparency was lost in the process" are factually incorrect statements when the process of site selection has been explained to and approved by Members and subject to consultation.

Paragraph 10:
This paragraph states that no mention was made of the Strategic Sites Topic Paper or the method of assessment at the meeting of the Executive on 23 April 2009. This is incorrect. The Executive Report (item 8) clearly says that a list of topic papers and sustainability appraisals of policies is available on request as key background documentation. Appendix A was the Options for the Future document, Appendix B was the Combined Strategic Housing Sites Appraisal Document (i.e. the strategic sites topic paper but NOT the strategic sites SA policy paper), and Appendix C was the sustainability appraisal of strategic sites (i.e. the site selection framework which informed Appendix B and the Strategic Sites SA policy paper).

The paragraph goes on to say that it was emphasised to Executive that no view was to be taken on the Core Strategy at this stage, but that it was merely a decision to publish the documentation for consultation. The recommended action of the Executive report is 'that Members approve the draft West Berkshire Preferred Options Core Strategy' and paragraph 1.1 states that “This report seeks approval by Members of the draft Preferred Options Core Strategy which is attached as Appendix A”. Paragraph 1.6 states that “It is proposed that the Preferred options Core Strategy, once agreed by Members, is published for a 6-week period of public consultation beginning in May”. Members could not agree to publish the document for consultation in isolation from agreeing the content of the consultation document.

Paragraph 11:
The quote within paragraph 11, “the site selection process…cannot be a precise science”, is taken from the Combined Strategic Housing Sites Appraisal document (Phase 1) paragraph 1.3 and cannot be seen in isolation from the rest of the paragraph where the process is set out. The paragraph says:

> *“The site selection process can only give a considered view – it cannot be a precise science. Some issues can be ranked, but in other areas this would be purely subjective and would be unlikely to stand up to scrutiny at the Examination in Public. It is the role of policy makers to weigh up all of the evidence and make informed decisions about which sites to move forward with. Sometimes issues will arise from the evidence which can be overcome or mitigated against. Other issues will be showstoppers which will prevent the site from proceeding.”*

The footnote (no.3) relating to paragraph 11 attempts to compare the site selection process to HR and contract procedures which is misleading and also seeks to imply that the Planning Authority is ‘gifting’ the landowners of the Sandleford site without following a transparent and objective process. This is an unfounded statement.

The same paragraph states in the final sentence that ‘It assessed the same 11 sites without appearing to use any objective scoring system at all’. The Combined Strategic Housing Sites Appraisal Phase 1 document appraises sites following on from the Site Selection Framework which used the scoring system to inform the next stages of the SA/SEA. The Combined Strategic Housing Sites Appraisal Phase 1 document sets out that the consideration of sites is not just the Site Selection Framework but is also informed by national and regional guidance, the outcomes of public consultation, the vision of the Core Strategy, the SA process, the outcomes of the technical evidence base, including technical studies, and ongoing discussions with service providers. The consideration of sites had gone beyond the site selection framework to bring in the range of other factors that needed to be considered.

Paragraphs 12 and 13:
The minutes for the 1st May 2009 meeting state that "The Sustainability Appraisal and Topic Papers were intended for developers", which is a reference to the comprehensive documents (the SA and Topic Papers) likely to be of particular interest to the developers. They are all public documents which were advertised and made publicly available to everyone as part of the public consultations. There was never a suggestion that the papers were not intended for Members or the public. The consultation leaflets available as part of this consultation specifically referred to the Sustainability Appraisal as a consultation document.

The original scoring system still applies as the starting point to assessing any site, but it has to evolve into the main SA assessment. Members have been consistently informed that the site selection process must also take into account the technical evidence base and results from public consultation. Indeed, the Site Selection Framework SA Policy Paper states that the scoring of sites is the starting point for the site selection process.

Paragraphs 14 - 16:
Any Member unable to attend a PTG meeting could raise any issues/comments in advance through the Chairman or a substitute could be sent to the meeting as the papers had been sent in advance. In addition, it is important to note that Members of PTG approve the minutes of one meeting at the subsequent meeting, providing opportunity for issues and/or queries to be raised prior to approval.

The comment in paragraph 15 suggests that the topic papers and SA were not published at the submission stage, which is incorrect. The SA was published with the Draft Submission Core Strategy at Publication stage in February 2010 and submitted with the Core Strategy in July 2010 as this is a regulatory requirement.

Topic papers were updated for Submission in July 2010 and some were updated again in September 2010 and some new topic papers were created. The reasons for the publication of the updated SA Report in November 2011 were discussed at the August 2011 hearing session, are clearly set out in the Inspectors note and explained in detail in the consultation material.

The quote in the attached document "some policies, in particular the strategic sites, are still to be firmed up and so the [SA] will be published at the submission stage" is incorrectly taken from the section in the report under Item 4, in relation to the Appropriate Assessment, NOT the Sustainability Appraisal. The correct quote from the report is "It was considered premature to publish what would be a draft AA at the preferred options stage given that some policies, in particular the strategic sites, are still to be firmed up and so the report will be published at the submission stage".

The two sentences that have been written on the consultation responses to the SA/SEA do not sufficiently cover what the comments received said and the Council's response to those.

Paragraph 17
The minutes of the 30th October 2009 and 27th November 2009 meetings are contained within CD09/48A.

Paragraph 18:
No comment

Paragraph 19:
It is important for clarity to set out the full quote, referenced within the attached document, taken from the Combined Strategic Housing Sites Appraisal document (Phase 2) in order to set the context in which the quote relates. Paragraph 2.2 states:

> *'It has been, incorrectly interpreted, that the sustainability appraisal and the subsequent ranking should be used as the basis for identifying the strategic sites and this has become evident through the consultation period. A sustainability appraisal is an initial assessment of the sites, if this were to be the tool used to identify strategic sites there would be no further need for any technical evidence base or officer interpretation. It is necessary to use the sustainability appraisal as a starting point and then look at this together with the evidence base, and detailed site information. For example when assessing the Sandleford Park site in greater detail and assessing the proposed development area rather than the mid point of the site the scoring is significantly different and would have given an entirely different range of sustainability scores and had a dramatic effect on the ranking. However, this approach could not be taken in a consistent way at any stage during the Core Strategy process due to the differing levels of information available for each site. Therefore the most appropriate way this can be considered is by officer interpretation and analysis of the evidence base, rather than solely relying on the sustainability appraisal'.* (underlining is additional emphasis explained below)

In relation to the footnote (no. 5) the Site Selection Framework has not been abandoned and still forms part of the SA/SEA.

Comments on Conclusion
Paragraphs 20 - 22:
By stating that it was only in September 2009 when Sandleford became the preferred second strategic site that strong objections to this choice started to be made is confusing and misleading as this date appears to be in reference to the September PTG meeting. The Preferred Options consultation in May-July 2009 had Sandleford as a potential reserve site, along with two others, and some objections to the site were received as part of that consultation process. In fact it was in February 2010 at Publication stage that Sandleford was published in the Core Strategy as a strategic site.

Contrary to the assertions made within the attached document the SA has been brought to Members attention on numerous occasions throughout 2009. In addition, the SA and various topic papers were published with the draft Core Strategy at the preferred options stage in May-July 2009. The preferred options stage was not a regulatory requirement. The SA and various topic papers were also published at Publication stage in February 2010 and Submission in July 2010, plus updates to the SA through the Examination process. The Combined Strategic Housing Sites Appraisal Document phase 2 was published at Submission stage. A Strategic Sites SA policy paper was included within the SA at the preferred options stage and this was updated, as all relevant SA policy papers were, to reflect the consultation process and ongoing SA work. Combined Strategic Housing Sites documents 1 and 2 clearly show that the consideration of sites must, and has, evolved beyond the site selection framework.

Following the Forest Heath, Newmarket Judicial Review the basis of the concern from the Inspector is that the Combined Strategic Housing Sites documents were not part of the SA at the publication stage and therefore the SA in its isolation did not

sufficiently explain the reasons for the selection of Sandleford and the rejection of the alternative sites. This information was available in the supporting documentation but not set out in full in the SA document.

The Inspector has not determined whether policies in the Core Strategy are sound until he produces his report at the end of the Examination process.

In reference to the final paragraph, the PTG minutes and reports along with those brought before the decision making committees of West Berkshire Council clearly demonstrate the processes undertaken to decide upon the proposed strategic sites.

Amended "Appendix 8. Re-assessment of Newbury Options" in Sustainability Appraisal (SA)

(impact of re-appraisal of scores and re-interpretation of site characteristics)

Introduction.

The Purpose of this document is to discredit the process used in the published Core Strategy for selecting a second strategic site, not to argue for North Newbury to be that site. The case for there not being a second strategic site at all is set out separately, in our document "***If not Sandleford, then where?".***

The West Berks Council planners dropped the weighting of Sustainability Sub-Objectives for Strategic Sites after the initial stage (Summer 2009) of scoring the 11 sites submitted by landowners & developers. This was done without consultation, although the original scoring system had been consulted on and approved by Councillors. The same councillors were only told about the change after the Core Strategy was approved by Full Council in Jan 2010.

The original scoring system is described under "Site Selection Framework" in the SA. There are many more sustainability sub-objectives but most do not affect scoring at Core Strategy stage and the remainder scored both sites the same throughout and the officer interpretation is sound. The table below only includes those sub-objectives where either (a) the scoring was different for the two sites or (b) there is clear reason to question the officer opinion and score for one or both sites.

Approved 'sub objectives' original scoring system			Sandleford (& Racecourse)					North Newbury (& Racecourse)				
No	Description	range	Orig score	Council Revised SA		Re-assessed SA		Orig score	Council Revised SA		Re-assessed SA	
		(H/M/L)		SA	Comment	TV Comment	score		SA	Comment	TV Comment	score
3a	**To improve access to education, employment and services**	-6 – 6 (H)	-1 (-)	(+)	Despite "capacity issues … particularly for secondary [schools] as both sites are in its [Park House] catchment", "opportunity to extend" and "create new" [primary school] is seen as positive. Newbury retail park, Tesco superstore, car showrooms cited as "employment opportunities" nearby.	Employment opportunities said to be "easy walking distance" are all (except schools) across busy A339. Access to town centre and main employment areas all only via highly congested roads and steep hill (for cyclists): no off-road routes for pedestrians.	**-2**	-3 (-)	(-)	Although site promoter "indicated that enhanced education facilities could be provided", Council said "hard to see how primary site could be extended". Proximity of Vodafone acknowledged, also "easy reach of facilities and employment opportunities". "Significant issues regarding connectivity and permeability of site as divided by A339. This would be an obstacle to creation of an integrated	Significantly closer, by road or foot/cycle-path to all facilities except medium sized supermarket. Especially well located w.r.t main employment areas: all within 2 miles and without (by non-motorised means) using busy roads or gradients. Clearly scope for extending all nearby schools. Winchcombe has further ½- yr entry site capacity. Shaw & Trinity have available land adjacent. Ignores existence of	**+3**

Approved 'sub objectives' original scoring system			Sandleford (& Racecourse)					North Newbury (& Racecourse)				
No	Description	range	Orig score	Council Revised SA		Re-assessed SA		Orig score	Council Revised SA		Re-assessed SA	
		(H/M/L)		SA	Comment	TV Comment	score		SA	Comment	TV Comment	score
										community".	underpass north of Vodafone roundabouts. Head of Housing told Planning Task Group that site naturally divides into phases and that one large site is less favourable to creation of integrated community.	
3b	**To improve access to the countryside, parks and open space**	-4 – 4 (M)	-4 (0)	(+)	"Development …could improve access to adjacent countryside. Open space ..could be provided on site. Attractive open landscape to south. Close to Greenham Common and The Chase."	No prospect of access (without car) to any of named "adjacent countryside" without crossing and/or using very busy dangerous A339. Ramblers rate this aspect poor.	**+1**	-3 (0)	(0)	Development "could improve access to adjacent countryside. Open space .. could be provided on site [but] does not have opportunity for significant area of open space on site. Relatively close to Snelsmore Common and could provide links to adjacent Brickkiln Wood"	Access to named adjacent countryside would not involve crossing any road (Brickkiln Wood) or only a B-road (Snelsmore). Also within 400m of Lambourn Valley Way and well connected to rights of way network to NW & SE. Applicants own Brickkiln Wood, so could make it public access.	**+3**
4a	**To reduce the need to travel, especially by car**	-6 – 7 (H)	-6 (0)	(0)	"The northern part of the site is within easy walking and cycling distance of town centre and close to local retail and other facilities"	To reach town centre from every part of site requires going via Monks Lane ridge – 35m above river – and routes are all along roads. To reach anywhere else (except local shops & schools) involves at-grade crossing of busy A339. Hence hard to "encourage alternative means of transport".	**0**	0	(0)	"North Newbury is likely to have slightly less impact on the strategic [road] network". Highways Agency particularly concerned about easy access to its roads – mitigation essential between N Newbury A339/A34/M4 (J13-J12).	Less impact on A339 south of Newbury – where combination of the two sites will add greatly to traffic flows especially within Newbury itself. A339 north of Newbury would appear to have plenty of capacity – and provides for good separation of modes, thereby encouraging walking, cycling and use of buses. No part of site is >25m above river, most is <15m, not noticeable for cycling.	**+3**

Approved 'sub objectives' original scoring system			Sandleford (& Racecourse)					North Newbury (& Racecourse)				
No	**Description**	**range**	**Orig score**	**Council Revised SA**		**Re-assessed SA**		**Orig score**	**Council Revised SA**		**Re-assessed SA**	
		(H/M/L)		**SA**	**Comment**	**TV Comment**	**score**		**SA**	**Comment**	**TV Comment**	**score**
4c	**To increase opportunities for walking, cycling and use of public transport and ensure the necessary infrastructure is available.**	-6 – 8 (H)	4	0	"There is an existing cycle link alongside Monks Lane. There are already established bus routes…"	See above. Walking and cycling within the site OK but unlikely to be used for access to external facilities, esp. town centre. New road access (x2) onto Monks Lane will have negative impact on cycling E-W here for Wash Common residents and Park House pupils. Walking routes are all along roads: unpleasant. Also further to all town centre facilities (exc. station) than for North Newbury. Public transport use unlikely to rise significantly unless frequency is >10mins and/or price is much lower. Without bus lanes, the congestion will slow the buses.	**-2**	0	0	Recognised by Council as being closer to town centre than Sandleford (exc. for station).	No recognition by Council of Vodafone buses potentially being available to residents, or of quicker route along A339 for buses, also along Oxford Rd – where existing service could be enhanced. No recognition of significance of whole site being much closer in height than Sandleford (mainly 3x less) and the off-road cycling & walking routes, with underpasses, that already exist to link it to town centre. Very pleasant cycle route. Much lower spend on infrastructure needed to ensure greater use of non-motorised transport – hence that "necessary infrastructure is available". Modal separation already available.	**+6**
6b	**To conserve and enhance character of landscape**	-8 – 7 (H)	-2	-	"most of the development is not in conflict…" but "landscape impacts will be paramount in drawing up more	Still part of the development that will be in conflict. Also views into site from Newtown area will be spoiled,	**-2**	-2	0	"CPRE see this as a more acceptable site than Sandleford on landscape grounds. Other comments have stressed the impact on the gateway to Newbury	Development will be set well down into valley and only visible looking out from Love Lane, Oxford Rd north of Donnington or A339 as it approaches	**+1**

Approved 'sub objectives' original scoring system			Sandleford (& Racecourse)					North Newbury (& Racecourse)				
No	**Description**	**range**	**Orig score**	**Council Revised SA**		**Re-assessed SA**		**Orig score**	**Council Revised SA**		**Re-assessed SA**	
		(H/M/L)		**SA**	**Comment**	**TV Comment**	**score**		**SA**	**Comment**	**TV Comment**	**score**
					detailed proposals"	as Newbury 'spills over' onto south-facing slope.				from the north and the impact on Donnington village – loss of gap between Newbury & Donnington."	Vodafone. Otherwise no landscape impact for that part of site below Shaw Farm Lane, which is sufficient land for Plan Period. Could be argued as enhancing the setting of Vodafone.	
6c	**To protect, conserve and enhance the built, cultural and historic environment**	-6 – 3 (H)	-6	0	Development to north of site would not impact on Donnington Priory	Accepted	**0**	0	-	"Potential impact on Donnington Castle, the setting of Donnington Village and site of Second Newbury Battlefield."	This statement shows no direct knowledge of the site. There is certainly no impact on Donnington Castle or Village. It can be seen from neither. As for Battlefield, the Trust merely express "concern at potential impacts". Vodafone development is not known to have uncovered remains: nobody knows!	**0**
7c	**To maintain and improve soil quality**	-4 – 2 (M)	0	-	Grade 3 agricultural	No comment	**-2**	0	- -	Grade 2 & 3a	No comment	**-4**
10b	**To sustainably manage flood risk to people, property and the environment**	-6 – 0 (H)	0	0	Flood Zone 1 – no inherent risk	No comment	**0**	0	-	Flood Zone 1 but potentially a ground water emergence area, evidenced by Vodafone flood in July 2007. Would need "robust mitigation measures".	Major development woul make mitigation measures viable and could reduce the risk of future ground water related flood incidence.	**-3**
Comparative overall Scores			-15	0			**-7**	-8	- - - - -			**+9**

Council Response to:

Amended "Appendix 8. Re-assessment of Newbury Options" in Sustainability Appraisal (SA) (impact of re-appraisal of scores and re-interpretation of site characteristics)
(Attachment to representation by West Berkshire Liberal Democrat Shadow Executive on policy CS4 in light of the changes to the SA/SEA and FEPFC 19)

This is a very confusing attachment and several points made in this document require correction or amplification as they are considered misleading:

Text under introduction:
The document states *"The West Berks Council Planners dropped the weighting of Sustainability Sub-Objective for Strategic Sites …. This was done without consultation"*. Firstly, it is important to point out that the weighting has not been dropped. The weighting was only for the Site Selection Framework and was never intended for the remainder of the Sustainability Appraisal (SA). The report and minutes of the February 2009 PTG (not 'Summer 2009' as stated in the attached document) demonstrates that the SA process was explained to members. The meeting shows that Members were told that the strategic sites would be assessed in the SA as presented in the example topic paper in Appendix C of the report, and that the assessment method was different to the site selection framework which was set out in Appendix B. The example of the settlement hierarchy topic paper with the SA of the options clearly showed Members what the SA process was for each option/policy and how they would be appraised, i.e. the use of ++, +, 0, -, --, and the commentary of the assessment against each SA sub-objective, and most importantly that they are not subject to weighting. The weighting was only for the Site Selection Framework and was never intended for the remainder of the SA and Members were advised of the different assessment method at the February meeting, not after the January 2010 Full Council meeting as stated within the attached document.

The selection of the strategic sites started off using the site selection framework (using criteria and weightings) and this informed the consideration of the sites within the SA process (objective led assessment). The weightings were therefore not in effect dropped but remained as part of the site selection framework.

The SA (which includes the site selection framework and the strategic sites SA policy paper) was published for consultation with the "Options for the Future" Preferred Options Core Strategy document May-July 2009. The SA was updated and published to accompany the Publication Core Strategy consultation in February 2010, and the Submission of the Core Strategy in July 2010.

The process of the selection of the strategic sites is fully explained in the strategic sites SA policy paper (Oct 2011), in addition to the information within the SA report (Oct 2011).

Reassessment tables:
The 'amended Appendix 8' is made up of extracts from the site selection framework and the main SA appraisal. The 'amended Appendix 8' demonstrates that it is not possible to combine the site selection framework with the main SA process.

The three columns under the heading "Approved 'sub-objectives' original scoring system'' are correct in content from the site selection framework but fail to list the

relevant 'appraisal approach to scoring' which is the criteria that produces, and therefore explains, the score.

In the column titled "Orig score" the first few rows include the score from the site selection framework and the SA score (from the Strategic Sites SA policy paper) in brackets. However part way through the 'Amended Appendix 8' only score is shown and it would appear that the SA score has been removed showing only the site selection framework score. This is misleading as it tries to combine two separate processes into one and it is not consistent or clear to the reader why the score has been removed.

The adjoining column "SA" is the score from the Council's revised SA of the sites which are those in green boxes in Appendix 8 of the Strategic Sites SA policy paper. For these three scores for both Sandleford (& Racecourse) and North Newbury (& Racecourse) there should be 48 scores (i.e. site selection framework, SA, revised SA, for two sites, using 8 sub-objectives). However, only 37 are present and of those only 32 are correct.

The column titled "score" lists scores highlighted in yellow with no explanation as to where these scores have come from or how they have been reached, are they new scores using the site selection framework (for the sites on their own or somehow in combination with the Racecourse) or are they a new SA score from Appendix 8? Taking sub-objective 3b as an example:
The site selection framework scores sites using a map of open space, where a site scores ++ if it is within 400m of an area of open space or will provide new open space, -- if the site will result in the loss of open space or countryside used for access and recreation. With a ranking of 'Medium' this means the only possible scores are -4 or 4. For Sandleford in the site selection framework the Council scored it -4 (loss of countryside used for access and recreation). In the 'Amended Appendix 8' the score is given as +1. There is no explanation as to how this score relates to the scoring mechanism of the site selection framework. The main SA does not provide numerical scores only ++, +, O, -, --, +/- and supported with a comment.

The bottom row titled "Comparative overall scores" are incorrect and unexplained. As an example, the site selection framework scored Sandleford -16, the Combined Strategic Housing Sites Appraisal Document phase 2 revised the score to -14, not -15. The main SA summarised Sandleford & Racecourse to have a predominantly neutral effect, not 0. So the 'Amended Appendix 8' revised SA score of -7 is unjustified and incorrect. The same goes for North Newbury (& Racecourse).

Specific SA sub-objectives:
The document generally takes selected comments from the Council Revised SA and uses them out of context, confusing the original comments with the updated comments based on the re-assessment. It ignores the evidence that is readily and publicly available to support the Council's case. The following table take relevant SA sub-objectives in turn:

Sub-objective from 'Amended Appendix 8' attachment	Council Response
No 3a: • States that despite the Council raising 'capacity issues' for education, Sandleford receives a	• Detailed explanation from the Council's Education service indicating a 'very strong preference for the Sandleford

positive score. • States that for North Newbury there is 'clearly scope for extending all nearby schools' • Misquotes Head of Housing as saying at PTG (17/10/11) that regarding concerns over connectivity at North Newbury 'site naturally divides into phases and that one large site is less favourable to creation of integrated community. Does not include quote from same meeting of Head of Planning which gives further explanation and clarity regarding this issue. Further explanation was also given by the Chairman of PTG.	site' is set out within Council's SA Appendix 8. • Education Service has commented that they would not support the North Newbury site (Core Document CD09/46). This was discussed at Planning Task Group on 17/10/11 (see presentation and also page 3 of the minutes). • Correct quote from Head of Housing is "2,000 homes in one estate was usually considered to generate housing management issues that were not desirable" Head of Planning explained (page 6 PTG minutes 17/10/11) that "for education a split site involved problems of access for children across a main road. There were also problems associated with the best location for shops and facilities with a split site."
3b: Correctly quotes from the re-assessment that 'development of site could improve access to adjacent countryside' and then criticises this due to the need to cross a main road to get to the countryside.	It is correct that to access existing countryside there would be a need to cross a major road. However, this ignores the proposal to create a Country Park or area of public open space on the site itself to take pressure of Greenham Common. This is set out within the Council's SA Appendix 8, formed part of the presentation to PTG and is minuted in the PTG minutes (17/10/11).
4c: North Newbury is recognised by the Council as being closer to town centre than Sandleford (exc for station)	Walking distance to Parkway from Sandleford is 200 metres further than from North Newbury, however to the Northcroft Street Bridge is 300 nearer from the Sandleford site. The Sandleford site is 800m closer to Newbury Railway Station.
6c: There is certainly no impact on Donnington Castle or village. It can be seen from neither.	The indicative Masterplan prepared for North Newbury and emailed to Cllr Vickers on 27/10/2011 shows residential development right up to the edge of Donnington village, which would have least impact in landscape terms but would have an impact on the settlement form, pattern and character. Though development would not be visible from the Castle or the older part of the village, any development would need to be careful not to compromise the setting of these. The concern is that the

	coalescence of Donnington and Newbury would impact on the settlement form and character This is set out within the Council's SA Appendix 8 and formed part of the presentation to PTG (slide 21)
10b: At North Newbury, with regards to flooding, 'major development would make mitigation measures viable and could reduce the risk of future ground water related flood incidence'.	This ignores the evidence set out within the Council's SA Appendix 8, which explains that the West Berkshire Strategic Flood Risk Assessment level 2 sets out that as well as being at high risk from surface run-off, the site would likely to be susceptible to flooding and increase the flooding from surface water run-off, groundwater run-off, groundwater and local drainage systems. This information was presented to PTG (17/10/11) and is minuted (page 6).

Newbury's New Housing

If not Sandleford Park, then where?

Of the 10,500 (min.) new homes that West Berkshire needs to provide between 2006 and 2026 (the so-called Plan Period), Newbury[1] has to take approx. 5,400. **That is 'a given' – not for consultation now**.

We understand this is how these 5,400 have been allocated:

- 777 already completed by 31 March 2010
- 2,564 were "committed" (i.e. under construction or on sites with planning permission) by that date. These include 1500 at Newbury Racecourse.
- 1000 Sandleford Park (i.e. only half the possible 2000 are actually needed in the plan period, the next 15 years)
- 1059 to be found in a selection of other sites, almost all of them 'brownfield' (i.e. on previously developed land or PDL). These sites will be identified in the next stage of the Local Development Framework process, known as the Site Allocations Development Plan Document (SADPD).

Rothwell House, Pembroke Rd
Typical PDL / Brownfield
Travis Perkins, Mill Lane

Before the SADPD is drafted, a review of the Employment Land requirement will be carried out[2]. This is significant, because almost all remaining sites in Newbury with potential for taking more than about 5 new homes each are currently designated for 'employment uses'. [There are few 'garden grabbing' sites left!] The Council has to prove that there is more than enough land for offices, factories, warehouses etc in Newbury, before it can release such land purely for housing.

So where could we find space for the 1000 homes allocated to Sandleford Park?

We think that the Council has not considered redevelopment of sites with a **mixture** of housing and employment uses in its view of what can be done in the future although this seems to be the future of urban development. (Parkway is a classic example, as is the approved site of Faraday Plaza – facing Parkway across Victoria Park and the A339.)

A site has to be capable of taking at least 500 new homes to be 'strategic'.

However it is possible to designate a 'broad location' (i.e. a group of sites, none of which need to be pin-pointed) as 'strategic'. That is what the Council has done for the East of the District, where an area described as

[1] "Newbury" includes those parts of Greenham, Speen, Enborne, Shaw-cum-Donnington and Cold Ash parishes that lie within the current "settlement boundary" of Newbury.

[2] We say this is overdue. The Employment Land Assessment published in 2007 and used as evidence in the Core Strategy was based on secondary data collected prior to 2005 and local fieldwork/surveys in 2006. This was an entirely different economic era, which is not going to return until almost half-way into the Plan Period – if at all.

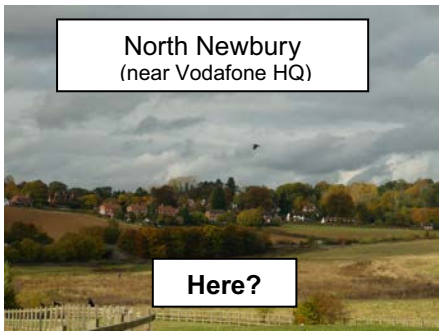
"the urban fringe of Reading, Theale and land between" are to take "about 500 homes".

We want Newbury's **Town Centre Periphery** to be considered as a strategic broad location for housing, so that there will be no need to designate Sandleford for housing at this time. We believe that, without losing any jobs from this area, we can redevelop a number of sites to provide at least 500 **more** in this area than the Council has taken account of.

Most of these sites are owned by the District Council. Many of them are in the flood-plain – but only another £110,000 is needed to ensure that a flood prevention scheme, already designed by the Environment Agency, can start next April and be finished within a year. We say the Council should put up this money, because it stands to gain millions of pounds in future rent and rates[3] revenue by protecting its properties from flooding.

That leaves only 500 homes to be put elsewhere. We say that a significant proportion (perhaps 150) could be built in Compton, where the Institute of Animal Health vacates a large employment site in 2013. The rest could be in smaller extensions of the Newbury settlement boundary, defined by the SADPD.

We think Sandleford is the least appropriate or 'sustainable' of all possible urban extensions that could be made at this time – largely because South Newbury is already committed to the Racecourse's 1500 homes. We have therefore carefully reassessed the "Sandleford vs. North Newbury" table in the revised Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA), which the Council has been made to prepare for this consultation. The Council's table is buried in Appendix 8 to "Strategic Sites Policy Paper", itself an appendix to the SA/SEA – and not actually something that you are being asked to comment on!!



Please compare our scoring of Sandleford & North Newbury with the Council's – and draw your own conclusions. Then tell the Council what you think. They will have to pass your comments on to the independent Inspector.

Dr Tony Vickers MRICS
for ***Sandleford: the Wrong Solution***

(November 2011)

[3] Although currently the Government takes all Business Rates revenue, the Coalition has said it will 'reward' Councils that secure additional new homes or "business growth" - £ for £!

Council Response to:

Newbury's New Housing: If not Sandleford Park, then where?
(November 2011)
(Attachment to representation by West Berkshire Liberal Democrat Shadow Executive on FEPFC 19)

Several points made in this document require correction or amplification as they are considered misleading:

- At this point nothing is "a given". The Core Strategy has been re-published for consultation along with a revised SA/SEA. There are no policy areas which are "not for consultation now" as stated in this attached document. The Council is asking for comments on the Core Strategy in the light of the revised SA/SEA and consultees are free to comment on any policy in the document.

- It is not true that almost all remaining sites in Newbury with potential for taking more than about 5 new houses are currently designated for employment uses. The Strategic Housing Land Availability Study (SHLAA) has identified a significant number of sites within Newbury that are potentially developable that are not protected employment areas. There is also no evidence put forward that "there are few garden grabbing sites left". The Council are not including garden sites in their estimates of land availability but these are anticipated to come forward for development in the same manner as they have previously.

- The Council has considered the potential for mixed use development. The Spatial Strategy (Policy ADPP1) states that West Berkshire's urban areas will be the focus for most development. The most intensively used developments, intensive employment generating uses, such as offices and intensive trip generating uses, such as major mixed uses, retail or leisure uses, will be located in those town centre areas where the extent and capacity of supporting infrastructure, services and facilities is the greatest.. The policy for Newbury (ADPP2) includes the regeneration of the Faraday Road area for mixed use and office development, as well as the development of the Market Street area as a mixed but predominantly residential area.

- A site does not have to be capable of taking at least 500 new homes to be strategic. If smaller sites had been central to the delivery of the strategy they could have been identified as strategic sites.

- The concept of a strategic broad location covering "Newbury's Town Centre Periphery" is not considered to be an effective mechanism for demonstrating the deliverability of the Core Strategy, as policies are already in place to facilitate housing development in this area, both in the Local Plan and the proposed Core Strategy. The broad location proposed for the East is different in that it identifies the direction of development beyond existing settlement boundaries.

- No evidence is provided that 500 more dwellings can be developed within the existing settlement boundary than the Council has taken account of. The Council's SHLAA has sought to identify all potential sites and no additional

sites were suggested by “Sandleford: The Wrong Solution” or Cllr Vickers when the SHLAA was published for consultation or since. The Core Strategy needs to be evidence-based.

- It is not appropriate for part of the allocation for Newbury to be developed in Compton. Any development at Compton would be included in the housing figures for the AONB. The Inspector has been particularly concerned that housing numbers proposed for the AONB should not be exceeded.

- The SA/SEA, both at publication in February 2010 and in the revised version published in November 2011, does not show Sandleford as the least sustainable potential urban extension. The Strategic Sites Policy Paper has been extensively revised to take on board further information regarding the potential site layout and consultation responses received. The comparison between the sites in tabular form is an appendix to this document (Strategic Sites Policy Paper), but is not “buried away”. The document is available from the Council’s webpage www.westberks.gov.uk/index.aspx?articleid=24036. Contrary to what is said in this attached document, consultees **are** being asked to comment on this if they feel it has implications for the soundness or otherwise of the Core Strategy policy. The SA and the Core Strategy are developed together and comments can only properly be made in relation to the Core Strategy: the SA is, in effect, part of the evidence on which the policies are based.

- The numerical scoring in Cllr Vickers’ re-working of the SA Table is hard to understand and illogical. There is no explanation of the change in scoring from the original Site Selection Framework and this table seems designed to confuse. The Council will respond to this as a separate Appendix.

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Appendix F

Representation by Say No to Sandleford (SNTS)

SNTS is campaigning for West Berkshire to abandon Sandleford as a strategic site for the allocation of 2,000 homes, and to re-examine the criteria of both type of site and site selection for the building of 5,400 homes in the Newbury area.

The representation is covered in detail in (pages 27 – 58)

Officer proposed Council response to SNTS (pages 28 – 58)

(i) SNTS representation on the Core Strategy in the light of the revised SA/SEA Report

A detailed analysis by SNTS contained in SEA-SA_Response.pdf with both an overall summary reproduce for these papers and selected key issues reproduced in tabular form. (page 29)
Officer overall summary response (page 29 – 30)

SNTS Tabular Appraisal (SA key issues) (page 31 – 44)
Officer response to Tabular Appraisal (page 45 – 50)

SNTS Tabular response to Core Strategy (page 51 – 53)
Officer response to SNTS Tabular Core Strategy response (page 54 – 56)

(ii) SNTS Representation on the soundness implications for the Core Strategy of the draft NPPF

Document states it is difficult to see how the choice of Sandleford meets this policy objective

Reproduced in full (page 57)

Officer proposed Council response to the above document. (page 57)

Council Response to:

Attachments to representation by:
Say No to Sandleford campaign (SNTS)
in relation to policy CS4 in light of the changes to the SA/SEA.

The SNTS representations were accompanied by the following e-mail sent on 16 Dec 2011.

"*SNTS is campaigning for West Berkshire to abandon Sandleford as a strategic site for the allocation of 2,000 homes, and to re-examine the criteria of both type of site and site selection for the building of 5,400 homes in the Newbury area. We believe that the thinking behind a second strategic site is fundamentally flawed and instead should be looking for smaller sustainable sites in and around Newbury in mixed development units. this includes making use of empty office blocks as well as small industrial unit on the east side of town Moreover we believe that instead of West Berkshire inviting developers to provide them with sites on which they have land banks that the council should proactively determine the best sites for development for Newbury irrespective of ownership and invite landowners to make best offers on their land to provide the council with value for money in addition to other criteria for the appraisal of potential sites.*

Finally we believe the consultation process, including the current iteration, to be fundamentally flawed and many of our supporters have been unable to give their feedback due to the complexity of the exercise. It has disenfranchised the computer illiterate including many elderly residents, working adults and those that find forms overwhelming. The earlier consultation when Sandleford was referred to as a reserve site gave false assurance to many people who did not engage with the process at that time. Whilst West Berks have been active in their consultation process it has also been ineffectual leaving many without a voice. The Web-replies file attached give voice to some of those unable to feed back directly themselves.

Our campaign group from its re-launch at the end of November now boasts over 200 members and the list grows daily. we hope that the West Berkshire Council will take note."

The representations were accompanied by two documents which set out the Group's assessment in more detail and a spreadsheet (the web-replies file referred to) containing the details and comments of individuals who had contacted SNTS. (70 individuals)

The Say No to Sandelford Group has also established a website at http://www.saynotosandleford.org.uk/ The following documents, which were written and submitted by the Liberal Democrat Group on the Council, were published on this website during the consultation period.

- How it went wrong in 2009
- Revised appraisal and site Scoring
- If not Sandleford, then where?

The information submitted by the SNTS Group also refers to a meeting held by Newbury Town Council on 7 December which was advertised by the Say No to Sandleford Group. Representatives of the Council were unable to attend this meeting and their offer to meet with Newbury Town Council, preferably prior to the Town Council meeting, was not taken up.

The SNTS Representation on the Core Strategy in the light of the revised SA/SEA Report

Reasons for compliance and soundness

If one reviews the statements made in support of Sandleford as a strategic site over the years, then the appraisal process moves from a set of objective measures against which it is reasonable to attempt to score (appendix 3 tables) to a set of very subjective measures (appendix 8). Moreover by discounting the early scoring mechanism and short listing sites that did not score well under the initial appraisal there has been introduced a natural bias towards Sandleford in any follow on Appraisal (10.8). We are also concerned that other sites have not had the opportunity to present information to the same degree as the Sandlford site (5.8). Any one of these points could be a point of legal challenge to the decision to make Sandleford a strategic site putting in jeopardy the Council's plan for delivering 10,500 houses by 2026.

I have provided a detailed analysis of this document in the attached document entitled: SEA-SA_Response.pdf However to highlight some examples

In considering Eastern sites Pincents Hill and Theale were deemed unsuitable in no small part because of the intense local opposition (11.20). However Sandleford has created as much if not more opposition as demonstrated by the petition presented to the Council on the 21 st July 2011 with 510 signatures and the more recent town council meeting that had 300 attendees where on a straw poll only 2 voted in favour of the development (11.33 to 11.37) Moreover the Council's consultation on Sandleford was by their own admittance flawed as they referred to it as a Reserve site only to chage it to a Strateigc site once the consultation had closed (11.29).

Finally an appraisal of Appendices 7 & 8 reveals a number of very subjective analysis (see A7 To reduce the need to travel especially by car, A7 to increase opportutnites for walking, cycling…A7 to increase the viability and vitality of commercial centres)

Council Response

The Council's detailed response is contained in the tables below which refer to the specific points raised in the SNTS representation.

On the issue of the consultation process the Council accept that it is a detailed and comprehensive consultation with four separate but related consultations running concurrently. We have tried to make it as user-friendly as possible and have made it clear that the team was happy to help anybody with the process of registering their comments. Forms were available in libraries and on the website for those who did not wish to use the online interactive documents to make their representation.

The SNTS website published a guide on how to respond to the Council's consultation. This gave the initial impression that the Council's consultation was too complex for most people, and this has undoubtedly affected the quality of the response. The SNTS document contained a number of inaccuracies (for example that comments were only allowed on the blue bits) regarding the consultation, which made it appear even more complex and may have confused some people.

The other documents on the SNTS were those published by the Liberal Democrat Group and submitted separately by the Lib Dem Group as part of their response to the consultation. The response to these is covered separately as an Appendix, but these are also felt to have coloured the responses received from individuals.

The SNTS representation was accompanied by a spreadsheet of comments, but it was not clear whether these were intended for publication. Where individuals later confirmed that they wish their response to be published, their comments are have been compiled into a table which will be added to the SNTS representation on the Consultation Portal. The Council response to these has been covered within the overall response to the SNTS representation.

Para	Statement	Response
1.2	In the light of concerns expressed, a revised SA of the alternative approaches at the Options for the Future stage has been carried out to incorporate results of technical studies and consultation responses, including those received since publication. An objective re-appraisal has been carried out to assess the alternatives against the SA sub-objectives, in the light of information now available	We do not believe that an objective re-appraisal has been carried out to assess the alternatives. Instead a retroactive exercise has been carried out to justify the original decision to prioritise Sandleford as a strategic site. Other options were not re-appraised as confirmed by para 5.8 where the document states: "However, it was not felt appropriate to re-visit the site selection framework at this stage as it would not have been possible to carry out the analysis of all sites on a consistent basis – as there were vastly different levels of information available for the various promoted sites. However, the information sent in was clearly part of the evidence base and was used as such in the officer assessment of the sites "
1.4	The Government Office for the South East's response to the publication version of the Planning Strategy raised 'a fundamental objection' regarding the lack of contingency or flexibility to deal with changing circumstances such as higher housing numbers. The Full Council meeting of 14 December 2006 resolved to endorse the submission of a new Project Plan that reflected the implications of a more specific and detailed Planning Strategy	It is true that by having a strategic allocation of 2,000 houses for Sandleford of which only 1,000 are allocated for the build programme to 2026 the Council has created a reserve bank of 1,000 houses. However it is our contention that this reserve is an illusion as Sandleford will more easily deliver the housing stock and so the full 2,000 houses will be developed within the plan period. This will create a large estate on the outskirts of town which is out of proportion with its surrounding area (Wash Common currently has 1280 houses) which will result in strains on the area's infrastructure which the IPD cannot relieve. The requirement for such a large site is unnecessary if more mixed developments are used in brownfield sites towards the town centre
1.5	~~The revised~~ PPS12: ...Potential strategic extensions were identified following the consultation in late 2007/early 2008 when developers, landowners and agents were asked to submit any sites that they wished to be assessed for development in the Local Development Framework. These sites have been assessed on a consistent basis through the sustainability appraisal, initially using the site selection framework, through analysis of the technical evidence base, and ongoing dialogue and consultation with stakeholders	We believe that sites have not been assessed on a consistent basis. Sandleford has been given the opportunity to provide more information to revise their offering to make it more sustainable in a way that was not offered to other sites under consideration. We believe that this leaves the selection of Sandleford open for legal challenge. (see para 5.8 for evidence) Moreover we believe that one significant stakeholder has been sidelined in the consultation process which are the residents of Newbury affected by the allocation of strategic sites. This is evidenced by the fact that the current consultation process is beyond most layman (see spreadsheet "responses") and would have passed them by had it not been for the active campaigning of the "SaynotoSandleford" campaign group.

Para	Statement	Response
2.1	The West Berkshire Core Strategy ~~will~~ needs to consider options for allocation of strategic sites related to the main urban areas which will deliver the vision of the Core Strategy.	We do not believe that consideration of strategic sites is a necessity. The opportunity exists for smaller scale developments in and around the town to provide the housing requirements on a more sustainable footing but that these options have been inadequately researched to determine how much housing could be accommodated in mixed developments using brownfield sites.
3.2	For social sustainability, Option 2 was the most sustainable as it would deliver housing over a wider area, meeting more of the District's housing needs rather than having the major sites all located within the Newbury/ Thatcham area	Far from delivering housing over a wider area, of the 5,500 houses determined for Newbury over 4,000 homes will be built in a concentrated part of South Newbury having to share the same infrastructure (This breaks down 1,500 committed for the Racecourse, 2,000 Sandleford and a further 500+ in-fill development including Pinchington Lane developments, Sheltered accommodation opposite the old hospital site on Andover road and ribbon development and apartments on Fifth Rd, Buckingham Rd and Andover Road from the old St Bartholomew School buildings. All feeding into the traffic hotspots caused by the pinch points on the South North routes through town.
4.4	<u>As a result four sites were eliminated at this stage from the process as they did not conform to the location guidance set out in policy WCBV1 of the (then) emerging South East Plan or to the preferred broad locational policy of focusing on Newbury/Thatcham and the Eastern Area.</u>	It is not obvious why some of these sites were eliminated from consideration. The Barracks at Hermitage are being vacated and so would make an obvious brownfield site development. Wash Water is currently a ribbon development with no local amenities, further development of this site with local amenities could reduce car journeys from the existing housing although this would not alleviate the main objection to Sandleford which is overdevelopment of the South side of Newbury resulting in an unacceptable strain on its infrastructure.

Para	Statement	Response
4.5	The remaining 11 sites were assessed on a consistent basis using the site selection framework (see the Site Selection Framework SA Policy Paper).	Appendix 3 shows that Sandleford was ranked joint bottom under this assessment, it states: "The landscape sensitivity study recommends that no further large scale developments should be located in this area although it concluded that some smaller scale development might be able to be accommodated where closely related to the settlement edge. Mitigation would be required to overcome the landscape issues identified". Moreover it goes on to state: "As the site covers such a large area, the impacts of only developing the northern most part of the site was modelled in the Transport Assessment in addition to the whole site. This demonstrated greater levels of accessibility from the northern part of the site than the whole of the site as it is closer to the town centre and adjoins the existing built up area. Developing only the northern part of the site would cause less congestion and less re-routing on major roads than developing the whole site although there would still be some congestion at key junctions and some re-routing on local roads." It is not clear how from this assessment Sandleford subsequently came to be the preferred Strategic site with an allotment of up to 2,000 homes involving the development of not just the northern edge but the entire south west part of the site including the footpath enjoyed by walkers on a daily basis. Nor is it clear how the core strategy has got over the central issues identified with the site: "There is a lack of capacity in local schools, with limited scope to expand. If the site were to be brought forward then discussions with the education authority would need to take place at an early stage to ensure that a solution could be implemented." These concerns have been bypassed with no clear explanation other than the implication that this original assessment study just got it wrong. Moreover the site is recognised as containing ancient woodland "which have been designated as Wildlife Heritage Sites, and several species of bat have been recorded in the area" two patches of these woodlands would become urbanised islands with devastating consequences on the wildlife. Note the original assessment has been amended with post justification as to why sites were taken forward which did not form part of the original assessment. As such it blurs the rationale of the original assessment with a post conclusion as to why certain sites were chosen to be taken forward. "the Combined Strategic Housing Sites Appraisal Document phase 1 (April 2009) to set out the reasons for rejecting and the reasons for keeping sites in the consideration of strategic sites taken forward in the Options for the Future consultation (the Preferred Options stage)" reads as if it were part of the original assessment with no rationale as to why preferred sites were excluded and low ranked sites included. The result is that a point scoring assessment on agreed rules were overruled by subjective judgements.

Para	Statement	Response
4.5		As an example under the consideration of Site 7 Newbury Battlefield the post rationale states: "The site benefits from its proximity to the town centre, giving it a high score in the Site Selection Framework, however transport modelling shows significant negative impacts on the road network" This is a site of 34 hectares. Yet in its appraisal of Sandleford which is not in close proximity to the town centre and would feed into the same traffic blackspots and is 140 hectares in size the conclusion is "Transport issues would also need to be resolved"
4.6	For the purposes of site selection at this stage, officers did not consider that the Newbury area included Thatcham as despite the close inter-relationship between the two areas, the South East Plan did not make an explicit reference to Thatcham, but instead referred to Newbury as a second tier sub-regional hub	It is not clear why the two sites at Thatcham were eliminated at this stage given the transport infrastructure Thatcham enjoys and that there is far less pressure on the East West transport links as opposed to the North South which bisects the town of Newbury.
4.8	The site selection framework assessment of the 11 sites and the summaries of the site assessments can be found in Appendices 3 and 4 of the Site Selection Framework SA Policy Paper	There appears to be no clear rationale as to how we get from the 11 sites in Appendix 3 even with the post write ups that take us to 6 sites to the 3 sites then identified in Appendix 4
5.2	Throughout the preparation of the Core Strategy the vision has always been to build upon the existing settlement pattern and to focus most development on the urban areas which have the infrastructure and facilities to support sustainable growth	It is hard to reconcile this statement with the assessments made in Appendix 3 and the eventual choice of Sandleford as a strategic site.
5.2	The east of the area adjacent to Reading has more limited development opportunities with floodplain to the south of Reading and the AONB adjoining the built up area to the west.	Yet the assessment of Pincents Hill in Appendix 3 states: "The Strategic Flood Risk Assessment (SFRA – level 1) indicates that there are no known issues relating to flooding on this site or in the immediate area"

Para	Statement	Response
5.4	Allocation of a broad location as a reserve site would introduce some flexibility into the plan and provide some degree of certainty over the long term future direction of development up to the end of the Core Strategy period and also beyond this date, in recognition of the need to plan long term, and to fulfil the emerging long term vision.	The council has repeatedly stated that they are making a strategic allocation of 2,000 houses on the Sandleford site to be able to hold 1,000 houses in reserve. This paragraph indicates that far from a reserve that the full 2,000 houses will be built either within the timeframe of the plan or shortly thereafter. As such the reserve potential they claim for Sandleford as their insurance is in fact an illusion. Of the 5,500 homes earmarked for Newbury one borough, Greenham is earmarked for a little under 4,000 of them. It is hard to equate this with paragraph 3.2 where Option 2 was selected with the option of spreading the housing over a wider area.
5.7	At this stage, Sandleford Park was considered by officers to be the most appropriate strategic site to fulfil the Council's long term vision and to deliver the objectives and policies of the Core Strategy up to 2026 and beyond. Whilst Sandleford Park had scored poorly in the initial Site Selection Framework, officers felt that potential mitigation would improve the sustainability assessment. The site had been assessed by officers using the red line boundary for purposes of consistency with the other sites – as set out at paragraph 4.5 above. However, this was giving a misleading outcome. The officer recommendation was that development of the whole site was neither appropriate nor needed to meet the housing requirements and the preferred location of development within the site would be that part closest to existing services and neighbouring residential uses and in the less environmentally sensitive areas, generally to the north and west of the site.	There is nothing in the policy paper to explain how this leap to prefer Sandleford was made. In the original assessment it was scored poorly even with mitigation of only developing the northern perimeter of the site. Moving the red line did not mitigate the original assessment as this had already been considered in the appraisal. In addition altering the rules for consideration of this one site without the opportunity for other sites to offer mitigation opens the council to potential litigation which puts at risk their ability to deliver Sandleford within the timeframe of the plan. As currently constituted by developing the site in the way envisaged the council will be creating a cul de sac of unbelievable magnitude.

Para	Statement	Response
5.8	Information submitted by the site promoter which showed how they intended to develop the site accorded with the officer view. This indicated that the proposed development would alleviate a number of the concerns which led to low scores within the site selection framework – for example, the location of development on the site would considerably lessen the landscape impact and the impact on the historic parkland	The revised proposal does not mitigate any of the concerns expressed in the original assessment. Landscape was not given quite the importance that this post justification claims: "The landscape sensitivity study recommends that no further large scale developments should be located in this area although it concluded that some smaller scale development might be able to be accommodated where closely related to the settlement edge. Mitigation would be required to overcome the landscape issues identified" The original assessment was for 2,450 homes, it is hard to see how 2,000 homes is viewed as a significantly smaller development.
5.8	However, it was not felt appropriate to re-visit the site selection framework at this stage as it would not have been possible to carry out the analysis of all sites on a consistent basis – as there were vastly different levels of information available for the various promoted sites. However, the information sent in was clearly part of the evidence base and was used as such in the officer assessment of the sites	This admittance would seem to open the Council up for legal challenge as an opportunity was given to one site developer that was not offered to other sites. Despite the work done in Appendix 3 under an agreed scoring system, it is now assumed that the sites cannot be analysed on a consistent basis. This appears to be changing the rules to suit the outcome rather than a rational basis from which a decision was derived.
5.9	This did not include the full assessment of either of the Thatcham sites, as at this stage the officer judgement was that they did not accord with the South East Plan policy WCBV1 which officers had assessed to relate solely to Newbury, not Newbury/ Thatcham (see also paragraph 4.6 above).	And yet under paragraph 3.2 Option 2 was preferred which was "**Option 2 –Newbury/Thatcham and Eastern Focus"**

Para	Statement	Response
5.12	The meeting of 9 April focused on the issue of strategic sites, taking into account the matters arising paper and the site assessments of the strategic sites in Thatcham. The minutes of this meeting set out that "..the scoring of each site was discussed and Strategic Sites 6 Version – October 2011 listed and their merits or otherwise explained.". At this stage, whilst only Sandleford had initially been shortlisted, full assessments of all of the sites had been carried out and officers knew enough about each of the strategic sites to discuss their potential with Members	The decision had already been made in 2009 that there was in effect a short list of 1 Sandleford. There was a clear bias in spite of members asking for 3 sites to be consulted on. But again no explanation as to how we got to Sandleford being the preferred choice.
5.15	Council Members agreed that one 'reserve' site would need to deliver up to 2,000 dwellings to give a firm steer about the future direction of growth in the Newbury/ Thatcham area giving long term certainty for developers, investors and the community. Each of the three shortlisted reserve sites had the capacity to deliver up to 2,000 dwellings.	It is not obvious why these sites were given priority over and above some of the other sites in the original appraisal of 15, nor of the rationale for one super site as opposed to delivering housing over a wider area as stated in Para 3.2

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Para	Statement	Response
5.16	The proposed policy approach seeks to provide an element of flexibility and contingency for the planned housing provision. One reserve site up to 2,000 dwellings has greater potential to provide this flexibility than additional but smaller scale strategic sites as it minimises the risk to delivery and phasing posed by infrastructure requirements of different strategic sites. Allocating one site in its entirety through the Core Strategy would ensure the holistic and effective planning of an urban extension and enable the provision of comprehensive long term infrastructure to help shape a sustainable community. Flexibility is also provided by planning for reserve sites later in the plan period when there is less certainty about housing delivery. Allocation of smaller sites through the Site Allocations and Delivery DPD would provide additional flexibility and help meet the housing requirements of the District as a whole	This entire paragraph reads as a post rational for a decision already made. It does not explain how we got to Sandleford as the preferred single site that appears in contravention of earlier objectives and the assessment conducted under Appendix 3.
5.18 6.2	The three shortlisted reserve sites (North Newbury, Sandleford Park and Siege Cross) in combination with the preferred site of Newbury Racecourse options were each considered in the sustainability appraisal	It beggars belief that the other two sites shortlisted for consultation alongside Sandleford had already in the original appraisal of 11 sites been identified as at risk from flooding, and yet in 6.2 this was identified as a new factor to consider against these options. Why were options prone to flood risk put forward by way of comparison with Sandleford when better options not prone to flood risk were available? Again this looks like post justification of the decision to go with Sandleford.
10.6	In response to the Newbury/ Thatcham options set out in policy CS9, the number of consultation responses was limited with only 54 responses. The responses were inconclusive on the preferred approach to a strategic site or broad location in addition to the Racecourse site, however, responses from site promoters were received with some further information about the 3 reserve strategic sites.	This consultation exercise is an indication of the failure of West Berkshire to get its message across and to engage with the people of Newbury. Many people in Newbury are unaware of the location of the Sandleford site, and those that do know were under the impression that it was a low priority having been ranked bottom of 11 sites in 2007 and listed under this consultation exercise only as a reserve site. And they wonder why only 54 responses were obtained? With such a response they should have questioned the methodology of the exercise and gone out again to garner more responses highlighting the implications to concerned districts.

Para	Statement	Response
10.7	**Sandleford:** A very strong preference. No capacity at the primary school so a new primary school would be required. Secondary provision would be the easiest to manage here out of the 3 reserve sites, the school could be expanded to a decent enough size to deal with the impact of the development.	What assumptions have been made about student numbers and has the Council taken into consideration that Park House is now an academy and therefore may have their own views on the ideal size for their school? Failure of Park House to expand sufficiently could be a major risk outside of the Council's control.
10.8	Additional concerns were raised regarding the potential for development of the North Newbury site to cause flooding issues. In particular a response on behalf of Vodafone refers to an extreme flooding event in July 2007 which resulted in the Vodafone campus being flooded at a resultant cost of £12 million	The flood risk of North Newbury site was already known at the outset so why was it included in the shortlist if this was to weigh as a major factor against the site?
11.1-11.7	**Approach to Thatcham**	There is a lack of logic in the Council's approach when looking at Sandleford versus Thatcham. The argument for a large strategic site is that there is leverage with the developers to extract large infrastructure improvements and to deliver other community amenities and to be able to better control the delivery of housing. These benefits are equally applicable to Thatcham which has more to gain from developer contributions than would be the case for Sandleford where it is acknowledge that: "the town centre is in need of regeneration and there are capacity issues with the schools. The capacity of the schools in Thatcham was a particular issue identified through consultation with the Council's education department". Elimination of Thatcham and with it large scale developer money for improvements does not seem logical.
11.15	This assessment, although not conclusive on which site was the more sustainable with the Newbury Racecourse site, clearly showed that Sandleford did not score more poorly than North Newbury or Siege Cross	The sites in Appendix 4 come out evenly under the criteria judged, however when viewed with the earlier assessment where North Newbury scored 0, Siege Cross -2 and Sandleford -16 should have been an indication that something was amiss with a large development on this site. The rationale again lacks explanation.
11.15	The officer recommendation remained to allocate Sandleford	In spite of the evidence stating otherwise and Council asking to broaden the consultation the decision had already been taken.
11.15	The North Newbury site, by comparison, is more remote from local facilities and is bisected by the A339	Again this should not have been a surprise fact and therefore if it was to be a major consideration why was it selected to run against Sandleford when other more appropriate sites had been identified?

Para	Statement	Response
11.16	The consultation raised some concerns about the 'reserve' site approach as this term was causing some confusion about what was actually meant	Having consulted in 2009 on a reserve site that they now acknowledge was wrong, they now promote Sandleford to a strategic site to allay the confusion and "provide certainty for the community" yet the community had not been consulted on this.
11.18	It was agreed by the Planning Task Group that the phasing of the strategic site at Sandleford should be amended to deliver 1,000 units by 2026 but that the overall scale of development should remain the same. This was in order that masterplanning work should reflect the full capacity of the site in order to maximise the long term benefits of the site and to ensure the delivery of the full extent of the critical infrastructure. This would also enable the development of a sustainable community and confirm the long term direction of growth at Newbury	As such the 1,000 reserve is no such thing and is acknowledge as an integral part of Newbury delivering its long term housing needs. The Council states that only 1,000 houses are to be built but are planning for 2,000 with scope for more if required. This again means that the major part of Newbury's new housing is being borne by one side of town which feeds into the crucial south north link road which is at the root of Newbury's traffic congestion.
11.2o	A possible strategic site at **Pincents Hill** generated a large number of objections prior to and during the 'Options for the Future' consultation, highlighting a considerable level of concern in the local area. Consultation is an important part of the evidence base and responses were taken in to account along with the technical evidence base and policy issues as part of the decision making process	The number of objections to Sandleford far outweigh those for Pincents Hill as evidence by the numbers that attended the Town Meeting (excess of 300) and the large and growing base of the SaynotoSandleford campaign group where membership is now over 200. At issue is the council has yet to offer a proper consultation over Sandleford in terms that most people of Newbury can understand. It is hard to understand the differing approaches on this towards Pincents Hill as opposed to Sandleford. The Council acknowledges this when stating that a planning application for Pincents Hill "generated a high degree of public awareness for the proposal" an opportunity never afforded to the residents affected by Sandleford.
11.21	The Phase 2 Transport Assessment (CD09/25) and the planning application highlighted a number of transport challenges for the area including capacity issues along the A4 and at specific junctions, needing a high level of public transport mode share, a high take up of travel plan measures, capacity issues at M4 Junction 12, and landownership and funding issues relating to the identified improvements.	All of these points are relevant to Sandleford which will be feeding in to the major south north link road along with traffic from the Racecourse Development and the some 500 odd houses from in-fill development. The A339 that bisects the town is already congested to a standstill at certain times of the day and it is difficult to see how Sandleford can do anything but make a bad situation a lot worse as car journeys from the estate will be required for work, to the station as well as the shops (Parkway shopping centre and its car park can only be accessed from the north side of town).

Para	Statement	Response
11.23	It would conflict with the theme of the Core Strategy to retain the individual identities of separate settlements	Yet the separate identity of Wash Common, a community of 1280 houses is not a factor in the Council's deliberations.
11.23	There was widespread local opposition, and this forms an important part of the evidence base. As a result the option for a strategic site at Pincents Hill was rejected	As is the case with Sandleford.
11.24	The 'Options for the Future' consultation generated multiple objections against the site including concern over the in-combination impact of the development with the committed but unbuilt development of 350 units at Theale Lakeside. Infrastructure, including services and facilities will need time to adjust to the increase in households and population from Lakeside which has already resulted in the need to expand the sixth form and primary school	Again the logic used in considering the eastern area development is completely missing in consideration of the development of Newbury. If we were to substitute a few words shown in italic: "The *Core Strategy* consultation generated multiple objections against *Sandleford* including concern over the in-combination impact of the development with the committed but unbuilt development of *1,500 units at The Racecourse*. Infrastructure, including services and facilities will need time to adjust to the increase in households and population from *The Racecourse* which will already result in the need to expand *the Park House secondary school*. The rationale used in one part of the district is completely overturned in another part of the district where the number of units being discussed are more than a factor of 5 greater indicating a lack of consistency in the approach taken in the core strategy.
11.29	In the Newbury/Thatcham area and in the Eastern Area the "Options for the Future" consulted on a number of options, previously assessed in the SA	However Newbury has not been properly consulted over Sandleford. In the Options for Future it was posed as a reserve site not a strategic site and as such was not viewed by many people as a serious issue.
11.3o		As such the Council took its decision on Sandleford in January 2010 without proper consultation with the people of Newbury in terms of location of the site, the number of houses likely to be built and the fact that this was a strategic allocation not a reserve site.
11.31	Policy CS3	Makes no provision for the required expansion of Park House although this is stated in the infrastructure Delivery Plan (Feb 2010)

Para	Statement	Response
11.33 - 11.37	**Consultation responses to the Proposed Submission Core Strategy**	The consultation exercise on the Core Strategy was flawed as is the current exercise. Households were not canvassed, many people remain ignorant of the location of Sandleford and the response mechanism discourages feedback. in spite of this a petition against the proposal signed by 510 individuals was presented to council on the 21st July 2011. This far outweighed the response on Pincents Hill that the Council was so swayed by (Para 11.20). The attached file entitled "respondents" indicates the depth of feeling and anguish about how this decision has come about without proper consultation with the people affected. The mitigating factors have not been properly assessed. Highway Agency may be happy with the impact on the A34 and M4 Junction 13 but this does not deal with the chronic traffic problems within Newbury, and the fact that at key interchanges pollution levels are already above acceptable levels. In our opinion the IPD does not adequately address this issue. It is hard to reconcile the Council's glib response to the consultation exercise given their approach to 11.24 above. Again the impression given is that Sandleford has been decided upon come what may and that the process has been distorted to achieve the desired outcome.
13.1	**Proposed Focused Changes Conclusion**	Again what measures did the Council take to promote this consultation exercise?
18	**SA/SEA Re-assessment following June 2011 Examination Hearings**	The Council carried out a re-assessment however only included Siege Cross and North Newbury in this - whose initial selection for comparison with Sandleford was flawed and created a natural bias towards the Sandleford site (see 11.15)
18.7	**Sub-objective: To reduce the need for people to travel, especially by car.** Significant increases in congestion are anticipated across the whole network as a result of overall background traffic growth and potential mitigation measures are set out	Developments to the West of the site increases the need for car journeys as opposed to mitigates it because the only access point is Monks Lane and they are the furthest point away from the retail park. People living in the South West of the site are more likely to have to use their cars for any activity. In addition to the South North flow caused by a desire to get to town/ work/train station there will now be an East West flow caused in addition to the retail park the need to access early learning at the Racecourse (as stated in the IPD) and vice versa the Racecourse accessing Park House School. Despite assurances the local traffic issues have not been thought through. Add to this the increased traffic from Greenham Park and the traffic to Sandleford Business Park then the entire development adds to the traffic misery that is the A339 as it sludges its way through Newbury.

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Para	Statement	Response
18.7	**Sub-objective: To increase opportunities for walking, cycling and use of public transport and ensure the necessary infrastructure is available** "... and from South Newbury the gradient may affect cycling usage"	That has to be the understatement of the year as anyone who has cycled up the gradient will testify. The proof is that in spite of the traffic and parking issues people from Wash Common will drive into town as cycling is not practical especially when shopping. Often strong winds and a steep incline makes it impossible. Any mitigation to traffic levels through opening cycle routes should be strongly discounted unless they introduce a ski lift!
18.12	This argument overlooks the sustainability appraisal and previous consultation, which has identified the preferred approach of a combination of PDL, small sites and strategic sites, the technical evidence base, which includes an assessment of the potential housing sites within the District and analysis of employment requirements over the plan period, and the sustainability impacts of additional development adjacent to service villages in the AONB.	The argument does nothing of the sort as it has been proven that the approach for appraisal of the different sites has been deeply flawed with a bias built in to the 'evidence' towards Sandleford as the preferred solution. All consultation exercises on Sandleford have been at best inadequate and when clear evidence of considerable local objection to the plans is presented to the Council it is ignored, where on other sites it has been a key determinate point in the exclusion of a site from consideration. This point is re-iterated in 18.16
A2 Site 13	Advantages vx Disadvantages	No mention of public meetings held to consider this proposal either in Greenham or Wash Common whilst public meetings were held for other contentious sites. The Town Council held a meeting on Dec 7th 2011 which was attended by 300 concerned residents. In addition outlying areas such as Kingsclere and Eccinswell have not been consulted on the traffic implications of the Development
A7	Capacity issues with schools for the Sandleford area, particularly for secondary as both sites are in its catchment.	The scores in Appendix 7 are totally subjective, see below for examples. Although in the text Park House is not seen as an issue it is marked here as a capacity issue as a minus this is turned to a ++ because Park House can be extended
A7	To reduce the need to travel, especially by car	This is marked as a neutral turned to a positive by the Policy yet any ordinary person would mark the necessity of travelling by car from the site as a double negative. Policies to get people away from the car to other modes of transport have yet to be proven and so this has to be viewed as high risk.
A7	To increase opportunities for walking, cycling and use of public transport and ensure the necessary infrastructure is available	Yet they have already assessed that the gradient is an issue. Unless they can eliminate it this also should be at best a negative and they are unlikely to mitigate it through policy.

Appraisal of: ***Strategic Sites SA/SEA policy Paper Update: October 2011***

Para	Statement	Response
A7	To reduce air pollution Any site in the Newbury area could influence the amount of traffic using the busy roads and intersections in Newbury where air quality is a concern.	What this does not account for is that congestion equals pollution and Sandleford will indisputably add to congestion. Its position on the busy south north axis that takes traffic close to the town centre has to have a greater negative value than any site on an east west axis where the likelihood of congestion is greatly reduce especially if positioned on the northern side of town. The appraisal of Sandleford does not take into account the already committed Racecourse Development whose proximity should add to the negative weighting of Sandleford.
A7	To maximise the use of previously developed land and buildings where appropriate	Sandleford is a greenfield site how can this possibly be marked as neutral?
A7	To increase the viability and vitality of commercial centres	Wherever these houses are built in Newbury will increase the viability of Newbury as a commercial centre so at best this score should be neutral. However there is a strong argument to state that Sandleford will add considerably to local congestion in Newbury and make it a place that outsiders would want to avoid so actually harm Newbury's standing as a commercial centre.
A8		As stated before the comparison with North Newbury adds nothing to whether or not Sandleford is the right site for development and the appendix should be discounted.

Council Response to detailed comments in SNTS appraisal of Strategic Sites SA/SEA Policy Paper update:

Para	Council Response to SNTS Comments
1.2	As described in the introduction, the SA/SEA paper provides a fuller account of the assessments undertaken and the decision making process which led to the proposed allocation of a strategic site at Sandleford and a broad location in the East. It presents this in chronological order, describing the reasons for the choices made at each stage. The SA/SEA re-assessment is covered in Section 18 of the document. This describes the re-appraisal of the alternative approaches at the Options for the Future stage. It was the decision for the choice between alternatives at this stage that the Inspector found was lacking in the SA at Publication in February 2010. SNTS refer to para 5.8 – this is describing the decision-making process leading up to Options for the Future and is not attempting any re-appraisal.
1.4	Sandleford does provide for some flexibility but it is highly unlikely that development can be brought forward to deliver 2,000 homes within the plan period. There is a considerable lead time required and delivery will to a certain extent be dependant on the market. Infrastructure will be provided alongside housing. The Core Strategy has taken the availability of brownfield sites into account. The Council's SHLAA has sought to identify all potential sites and no evidence is provided that more brownfield sites are available.
1.5	It is incorrect that the Sandleford site has been treated differently to other reasonable alternatives. The sites have all been evaluated in the same manner – using the evidence available. The Council did not restrict potential developers from submitting information, indeed the masterplan and technical reports for North Newbury formed a substantial part of the evidence base for the revised SA/SEA and at earlier stages. The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). The consultation was advertised as set in the Statement of Community Involvement (SCI) and documents were made available in libraries throughout the District as well on the Council's website. This has been a comprehensive consultation but we have tried to make the process as user-friendly as possible and have made it clear that the planning policy team is happy to help anybody with the process of registering their comments. Additional ways of responding included email and the paper forms, which are readily available. The advice on the SNTS website on how to respond was in some places misleading and inaccurate, causing some confusion.
2.1	No evidence is provided by SNTS that the housing requirement could be met from mixed use brownfield sites. The alternative approaches to meeting the housing requirement were considered in the Options for Delivering Homes consultation in 2007/2008 where the preferred option emerged of a mix of strategic scale sites, some smaller urban extensions and a continued emphasis on use of previously developed land. The SHLAA provides the evidence base for housing land availability.

3.2	Option 2 of the Broad Locational Policy Options refers to a focus on both the Newbury/Thatcham and Eastern Area as the most sustainable option. The comparison was with a Newbury/Thatcham focus where even more development would have been directed to the Newbury/Thatcham area.
4.4	Paragraph 4.4 sets out why these sites were rejected. They neither conformed to the SE Plan nor the broad locational policy to focus on Newbury/Thatcham and the East.
4.5	The SA/SEA process and its role in site selection are fully explained in the SA policy paper on Strategic Sites. The Site Selection Framework used weighting in the scoring tables. This stage of the SA process was a starting point for considering sites, a strategic level assessment to provide an initial broad comparison of the proposed sites. They were not intended to be a detailed project level assessment. This assessment informed the Core Strategy at the "Options for the Future" stage, the preferred options document. Criteria was developed for the Site Selection Framework to assess the sites against the SA sub-objectives and a weighting attached to them. Limitations of this approach have been set out within the SA, such as the impact of site size and the distance from the midpoint to the boundary of the site upon some of the criteria and therefore the scores achievable. The site selection framework was therefore the starting point and not necessarily the highest scoring sites would be taken forward as the commentary were key for taking forward in considering the sites in conjunction with the rest of the technical evidence base and the outcomes of public consultation. The assessment proved useful in highlighting potential sustainability issues with potential sites and potential mitigation, infrastructure and development requirements should the sites progress further. The selection of sites progressed beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the outcomes of the technical evidence base and the discussions with service providers to inform the process. The process therefore used the site selection framework scoring (with the weighting) and built on this to progress the potential sites through the process of the SA. The Combined Strategic Housing Sites Appraisal Documents have not been amended as part of the revised SA/SEA.
4.6	The SA sets out the reasons why the Thatcham sites were not recommended at this stage. Members, however, felt that a strategic site at Thatcham should still be included as an option. The Seige Cross site was taken forward as an option for consultation in "Options for the Future".
4.8	The rationale for not recommending Thatcham as a location for a strategic site at this stage was that it was not considered to be in conformity with the South East Plan. Neither does Thatcham have a level of facilities and services comparable to Newbury. The strategy is to reflect the existing and future role and function of settlements.
5.2	Newbury is the District's main centre and has a wide range of facilities and services. It is the primary settlement with the infrastructure and services to support sustainable growth. It is not hard to reconcile this with the decision to locate a strategic housing site as an extension to the town.
5.2	This paragraph states that development opportunities in the Eastern Area are limited by floodplain to the south of Reading. Pincents Hill to the west of Reading is not within the floodplain.
5.4	SNTS have misunderstood the intention, which is set out in paragraph 5.4. At the time of developing the options the Council wanted to provide certainty over the long term direction of development. It is not a question of holding 1,000 houses in

	reserve, but of planning the development of the site in the most appropriate way, bearing in mind all the factors including landscape, which will affect the design. Delivery of the housing is due to commence in the latter part of the plan period and is anticipated to continue beyond 2026.
5.7	Paragraph 4.8 of the Strategic Sites SA/SEA Policy Paper sets out how the sites were "shortlisted". The Combined Strategic Housing Sites Appraisal Document Phase1 had made assessments of all the sites. Sandlford had scored poorly in the initial Site Selection Framework which was based on the red line. The modelling of distances to facilities, for example, was based on the mid-point of the whole site. The "rules" were not altered. All sites were appraised in the same way and developers were not denied any opportunity to submit information regarding their site. A significant amount of information was in fact, received from potential developers and considered in the appraisals.
5.8	The proposal submitted by the site promoter did show how landscape issues would be treated. Substantive green infrastructure is proposed and this is shown in the draft masterplan. It is proposed to direct development to the north-western and western parts of the site, towards land which is well related to the existing built up area of Newbury. The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained with public open space/a country park created to retain the openness of this area and increase public access. This will respect the site as a gateway to Newbury and retain the attractive open landscape to the south. The Council's landscape consultant carried out additional landscape sensitivity analysis work for the Examination hearing session in November 2010 and concluded that "in principle, most of the proposed extent of development….is not in conflict with the findings of the Landscape Sensitivity Study of those in the Strategic Site Review"
5.8	Developers were not denied any opportunity to submit information regarding their site. A significant amount of information was in fact, received from potential developers and considered in the appraisals. The site selection framework was the starting point, other factors including the rest of the technical evidence base, the national and regional policy framework and the outcomes of public consultation were all taken account in the appraisals. The limitations of the Site Selection Framework have been set out in the SA. The SA had developed at this stage so that all policies were assessed using the same methodology, taking account of practice guidance on SA/SEA preparation.
5.9	Option 2 was a broad locational policy option for allocation of strategic sites. The assessment of individual sites within the broad location was a separate issue.
5.10	The officer recommendation in 2009 was for Sandelford to be proposed as a strategic site. The decision, by Members, was to consult on three options. There was no bias in the officer recommendation - it was based on an analysis of all the potential sites.
5.15	The reason for selection of these three sites is set out in the Strategic Sites SA/SEA Policy Paper, together with the rationale for a large site, which could provide a firm steer about the future direction of growth and be large enough to deliver community infrastructure. Paragraph 3.2 refers to the broad locational policy of the strategy - the reference to delivering housing over a wider area in this context refers to identification of a strategic site or broad location within the Eastern area as well as in the Newbury/Thatcham area.

5.16	This paragraph tries to set out the rationale for allocation of a large site of up to 2,000 dwellings. It does not attempt to explain how Sandleford became the preferred option.
5.18 6.2	The risk of flooding was not a new factor. The SA objectives and sub-objectives, include one on managing flood risk and have remained the same throughout the assessment. North Newbury and Seige Cross could not be ruled out purely because Critical Drainage Areas have been identified nearby. The SA has explained why other sites were excluded at this stage.
10.6	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). At the Options stage the consultation included a mobile exhibition which toured the District and publication of colour newspaper advertising and summary leaflets. Parish councils were sent posters and leaflets, which were also distributed to public venues.
10.7	In terms of education provision, the Council's Education Department believe that the most viable and sensible solution is to meet the impact of the Sandleford development through existing local secondary provision. This is likely to be on existing land and will involve re-modelling of the existing accommodation as required. At this stage they do not feel that there would be a requirement for additional land, but if this should be the case then this would form part of any detailed discussions/negotiations with the developer/land owner. This approach is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. Whilst Park House has become an academy, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty.
10.8	This paragraph is summarising some of the relevant comments from consultation. Sites were not ruled out for consideration unless they were located in Flood Zone 3.
11.1 to 11.7	The reasons for the approach to Thatcham are set out in the SA/SEA. Any developer contributions would be to mitigate the development, not to remedy existing infrastructure deficiencies. The Education Service was clear in its assessment of its preference for future education provision.
11.15	SNTS recognise that the SA at the Options stage in 2009 did not favour Siege Cross or North Newbury over Sandleford.
11.15	The Planning Policy team assessed all the information, including consultation responses on the Options and its recommendation was to allocate Sandlford. The decision was not made until Full Council in January 2010 when Members unanimously approved the Core Strategy for Publication and Submission to the Secretary of State.
11.15	Sandlford and North Newbury were considered the most appropriate of the potential sites adjacent to Newbury. The SA explains why other sites were not included in the "shortlist" at the Options stage.

11.16	The Council removed the term reserve but it had been clear at the Options stage that the intention was to identify a strategic site or broad location for future expansion of Newbury/Thatcham. The identification of this site "would give long term certainty about the direction of growth of Newbury/Thatcham up to and beyond the end of the Core Strategy period and introduce an element of flexibility to the strategy (Para 6.10 of Options for the Future). The community were consulted at the options stage and at Publication of the Core Strategy in 2010.
11.18	The documents do not refer to a 1,000 reserve. Policy CS4 states phased delivery of up to 2,000 dwellings.
11.20	The paragraph refers to consultation responses to the Options for the Future consultation.
11.21	The traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy. These are published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=16893. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
11.23	Wash Common is included within the Newbury settlement boundary and is not regarded as a separate settlement. That is not to say that is does not have a strong community identity.
11.23	The paragraph refers to consultation responses to the Options for the Future consultation. and specifically to Pincents Hill.
11.24	The paragraph refers to consultation responses to the Options for the Future on the option for development at Theale. The Options for the Future consultation did not generate multiple objections against Sandelford. The recent representations are being considered as part of the current consultation.
11.29	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14). It had been clear at the Options stage that the intention was to identify a strategic site or broad location for future expansion of Newbury/Thatcham. The identification of this site "would give long term certainty about the direction of growth of Newbury/Thatcham up to and beyond the end of the Core Strategy period and introduce an element of flexibility to the strategy (Para 6.10 of Options for the Future).
11.30	As above
11.31	It is Policy CS4 which makes provision for the required expansion of Park House School.
11.33 to 11.37	The local community have been consulted in full at each stage of the Core Strategy and the details of this are set out in full in the Council's Statements of Consultation, which are both Core Documents for the Core Strategy Examination and are publicly available from the Council's website (CD07/13 and CD07/14).

	These paragraphs relate to the representations on the Proposed Submission Core Strategy. The Council do not accept that the consultation exercises at the Proposed Submission stage nor the current stage have been flawed. The traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy.
13.1	The Proposed Focused Changes consultation was advertised in accordance with the Statement of Community Involvement, with newspaper adverts, information available in libraries and on the council's website.
18	The SA/SEA re-assessment in Section 18 of the document describes the re-appraisal of the alternative approaches at the Options for the Future stage. It was the reasoning for the choice between alternatives at this stage that the Inspector found was lacking in the SA at Publication in February 2010.
18.7	The traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy.
18.7	The Council accept that the gradient will influence the number of cycle journeys between the town and the site, but there will be opportunities for cycling to local facilities, particularly to schools and community facilities, important for younger people who do not have access to a car.
18.12	The comments related to a petition which did not draw on the evidence base.
A2 Site 13	These tables in appendix 2 are a record of comments made on the potential strategic sites at a stakeholder consultation session in February 2008. Adjacent parishes have been consulted throughout the Core strategy process.
A7	This SA was carried out to assess the implications of the revised policy CS4, amended as part of the Examination Proposed Focused Changes. This provided further detail on how the site would be delivered, which resulted in some revision of the scores which had been published at the Options stage. This has resulted in improved scores for a number of the sub-objectives. Though it is accepted that the scores are not based on measurable indicators they have been objectively assessed. For example, on reducing the need to travel, the Council do not accept that there is a necessity to travel by car from the site. The site is close to local facilities, including schools and shops, local churches and community facilities and new facilities will be provided on site. A significant proportion of the population will not have access to a car and the choice of other modes of travel including improved bus services is important to the creation of a sustainable development.
A8	The Council believes that this re-assessment demonstrates the reasoning behind the choice of Sandleford from the three alternatives that were presented at the Options for the Future stage. This is the reasoning that the Inspector felt was lacking in the SA that accompanied the Proposed Submission Core Strategy at Publication so is a critical part of the revised SA/SEA document.

Section	Statement	Response
4.11	The majority of development will take place on previously developed land	The Racecourse 1,500 Sandleford 2,000 South Newbury in-fill 500 The majority of South Newbury build is on greenfield and this accounts for 4,000 of the 5,400 homes Newbury has to build.
4.11a	*The Core Strategy Vision aims to build upon the existing settlement pattern and direct most development to those urban areas which have the infrastructure and facilities to support sustainable growth.*	In the appraisal conducted in 2007 of 11 sites Sandleford was rated the bottom site in terms of sustainability. Other ranking systems deployed by the council since that time have lacked the objectivity of the original scoring system (see Appraisal of: ***Strategic Sites SA/SEA policy Paper Update: October 2011)***
4.18	Housing Urban extensions to the town to the east, on land at Newbury Racecourse and, later in the plan period, to the south at Sandleford, will provide new residential neighbourhoods	The Newbury Racecourse is described as in the East it is in fact in the South East of Newbury. This is important as the vast majority of the new build for Newbury falls within the district of Greenham (although with the A339 divide Sandleford is more commonly associated with Wash Common). This means that the pressure from these developments fall onto the same traffic hotspots which already suffer from unacceptable levels of pollution
	Town Centre Any new office development will be directed towards the town centre and existing office developments uses given protection protected as set out in Policy CS 10	This appears to be living with past working practices and not caught up with new methods of working such as home working and hot seating. To preserve large blocks as purely the preserve of offices seems therefore counter intuitive and instead these blocks should be considered where feasible for mixed use development
	Employment *Protected Employment Areas, especially those in more accessible locations, will play a vital role in meeting the existing and future economic demands of the District*	It is not clear to me why we need protected employment areas when these could give way to mixed development sites where a certain level of business use can be guaranteed. This should especially be the case where there is a chronic need for space for houses.
	Business development within other existing employment areas, including New Greenham Park	This will increase traffic levels on the critical south north axis of the town which is find for creating employment but runs into conflict with the residential traffic flowing along the same routes from the Racecourse and proposed Sandleford developments.
	Accessibility Demand for travel will be managed	If the council pulls this off they will be the first people in history to achieve this. By creating a long Cul de Sac in Sandleford they are guaranteeing that car travel will be anything but managed.

Section	Statement	Response
	The impact on the Air Quality Management Area will be taken into account when developing transport solutions for the A339 and surrounding areas.	It is very difficult to see when you combine the increased traffic levels from development of Greenham Park along with the residential traffic from the Racecourse and Sandleford how the Council will pull this off as congestion at the problem areas will be much worse as they acknowledge in their site appraisals.
	Existing highway infrastructure will be improved to manage flows along the A339 and A4 corridors in particular.	At the end of the day however you still have only two lanes of traffic each way along the critical south north axis, and however much you tweak the junctions it is a pipe along which only so much traffic can flow. By biasing the development of new houses on the sought side of town they are increasing enormously the demand for flow without widening the pipe. Existing attempts to manage congestion through tweaking junctions has only had an effect at the margins, against that they have increased the attraction of north side of town through the parking arrangements for Parkway. Congestion by loading the south side of this route can only get worse unless they are able to rip out the A339 and move it East.
	Infrastructure requirements are set out in the Infrastructure Delivery Plan	This is untrue. The IDP sets out assertions of what needs to happen with no specifics of what that needs to be. How many places are they assuming will need to be created at Park House? How many more car journeys are they envisaging from the South side of town. Without these assumptions how can they determine the requirements? and how can we judge whether the Council will be able therefore to deliver on the improvements. Park House is now an academy so the Council has no control over the size that school is happy to become.
	Thatcham Thatcham town centre will be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres	Thatcham has been protected from any major development but with that has gone the prospect of developers money. Without that it is difficult to see how the Council given its budgetary constraints will be able to deliver on its vaunted improvements to Thatcham's town centre. The Core Strategy should have been updated to take in account this new reality and sites therefore re-appraised with this additional context. Sandleford doesn't need amenities if there are no houses there, Thatcham does regardless of any new build.

Section	Statement	Response
CS4 vs CS14	Sandleford Development versus Transport policy	Transport policy states that: "*Development that generates a transport impact will be required to:** Reduce the need to travel. Improve and promote opportunities for healthy and safe travel." It is difficult to see how the configuration of the Sandleford development meets these policy goals. The site is a long cul de sac running From Monks Lane in the north to the south west of the site that can only increase the demands of car travel as people get to work, rail, and shopping in the town (or retail park). This will not increase healthy or safe travel as car drivers will get stuck in congestion in the pollution hotspots.

Council Response to detailed comments in SNTS Core Strategy Response

Para	Council Response to SNTS Comments
4.11	The response contains factual inaccuracies. The Racecourse is classified as previously developed land. It is not clear what the respondent means by South Newbury in-fill. It is correct to state that the Sandleford site is a greenfield site, but 1,000 units are proposed to be built by 2026, as part of the 10,500 figure for the District as a whole. The previously developed land trajectory, which forms part of the Annual Monitoring Report shows how much housing is expected to take place on previously developed sites over the Core Strategy period http://www.westberks.gov.uk/index.aspx?articleid=4148. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes.
4.11a	It is unclear how the response refers to the specified section. The spatial strategy reflects the Core Strategy vision, with development following the existing settlement pattern in accordance with the settlement hierarchy. In terms of the comments regarding the ranking of Sandleford however, the SA/SEA process and its role in site selection are fully explained in the SA policy paper on Strategic Sites which was revised and published for consultation in November 2011. The Site Selection Framework used weighting in the scoring tables. This stage of the SA process was a starting point for considering sites, a strategic level assessment to provide an initial broad comparison of the proposed sites. They were not intended to be a detailed project level assessment. This assessment informed the Core Strategy at the “Options for the Future” stage, the preferred options document. Criteria was developed for the Site Selection Framework to assess the sites against the SA sub-objectives and a weighting attached to them. Limitations of this approach have been set out within the SA, such as the impact of site size and the distance from the midpoint to the boundary of the site upon some of the criteria and therefore the scores achievable. The site selection framework was therefore the starting point and not necessarily the highest scoring sites would be taken forward as the commentary were key for taking forward in considering the sites in conjunction with the rest of the technical evidence base and the outcomes of public consultation. The assessment proved useful in highlighting potential sustainability issues with potential sites and potential mitigation, infrastructure and development requirements should the sites progress further. The selection of sites progressed beyond the Site Selection Framework assessments and these were further investigated within the Strategic Sites SA policy paper and Combined Strategic Housing Sites Appraisal Documents phases 1 and 2, bringing together national and regional planning guidance, outcomes of previous public consultation, the vision for the Core Strategy, the SA, the

	outcomes of the technical evidence base and the discussions with service providers to inform the process. The process therefore used the site selection framework scoring (with the weighting) and built on this to progress the potential sites through the process of the SA.
4.18	In terms of traffic, the traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core Strategy. These are published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=16893. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636 The TA work and the IDP have been discussed through the Examination process, specifically at hearing sessions in November 2010.
Town Centres and Employment	The Core Strategy carried forward the Protected Employment Area designation to ensure that the health of the local economy is maintained. This is based on the Council's evidence base as set out in the Employment Land Assessment (ELA) which forecast changes in economic floorspace requirements to 2026. The Council recognise the importance of residential developments in maintaining the vitality of centres, but it is also recognised that such developments need to be balanced with the provision of employment. Policy CS10 of the Core Strategy does allow for non town centre uses, such as residential, within existing centres provided it can be demonstrated that such schemes would maintain the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre.
Traffic flows from New Greenham Park	The traffic generated by New Greenham Park is included within the traffic forecasting models which input into the 4 Transport Assessments (as above).
Traffic Demand management	Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be Travel Plans accompanying any planning application. Policy CS14 is the overarching transport policy for the Core Strategy – and each planning application has to demonstrate how it improves travel choice and reduces car use.
Air Quality Management Area	Both the LDF and LTP3 encourage modal shift. Transport mitigation and Improvement schemes will be put in place to manage traffic flows. There will be a Travel Plan for Sandleford as part of any planning application which will encourage and facilitate the use of sustainable modes of transport. Public transport infrastructure will be put in place. . In accordance with policy CS14, each planning application has to demonstrate how it improves travel choice and reduces car use.
Improvements to highway Infrastructure to manage	As set out above, the traffic impacts of the Sandleford development in combination with Newbury Racecourse and the other development in the Core Strategy have been assessed through 4 phases of Transport Assessment work which have been developed alongside the Core

flows along the A339 and A4 corridors	Strategy. These are published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=16893. Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636
Infrastructure Requirements are set out in the IDP	The IDP is the output of discussions with infrastructure providers, based upon the amount and location of the development in the Core Strategy. It also reflects the infrastructure requirements identified through other parts of the evidence base such as the Transport Assessments. For example, Transport Assessment Phase 4 (TA4) shows what relevant transport mitigation and improvement schemes will be needed to deliver Sandleford. Where these result in specific infrastructure requirements, these are set out in the Infrastructure Delivery Plan (IDP) which is published on the Council's website at http://www.westberks.gov.uk/index.aspx?articleid=19636. The IDP has been tested through the Core Strategy Examination process. In response to the education point, the IDP includes information from the District Council's education team. Their answer is based on current pupil numbers, pupil projections, the anticipated additional pupils from new housing, anticipated development timeframes and current Government policy. In response to the point on Park House, whilst Park House has become an academy, the Local Authority currently retains the responsibility for school organisation and is the body which negotiates and receives funding through section 106 and the Community Infrastructure Levy. Even though Academies are not maintained by the LA they are state maintained and continue to be part of our pupil place provision, and the Council will continue to work with them to ensure we meet our duty.
Thatcham town Centre regeneration	Improvements in Thatcham are not solely dependent on the Council (although specific schemes funded by the Council form part of the overall vision for Thatcham)– or on developer contributions. For example, the Thatcham Vision project has the aim of identifying needs and opportunities for Thatcham and to identify and take actions that will benefit people and the environment of Thatcham. As well as topic teams there are action teams which are implementing community led projects. http://thatchamonline.net/groups/thatcham-vision The Kingsland Centre is a current planning application which is not reliant on additional dwellings for its implementation.
CS4 vs CS14	Modal shift is encouraged by both the Core Strategy and the Local Transport Plan, and the infrastructure will be put in place to enable this. Additionally there will be Travel Plans accompanying any planning application. Policy CS14 is the overarching transport policy for the Core Strategy – and each planning application has to demonstrate how it improves travel choice and reduces car use.

The SNTS Representation on the soundness implications for the Core Strategy of the Draft NPPF

In the Media release on the draft NPPF it states on Sustainable transport:

"The Government is committed to cutting down pollution and congestion through the use of public transport. The Framework makes clear that local authorities should seek to ensure good access to high quality local public transport for new developments, with priority given to cyclists and pedestrians. It encourages decision-makers to provide charging points for electric cars and other low emission vehicles. *Wherever possible, key facilities essential to local life such as schools and shops should be within walking distance of most properties* ."

It is difficult to see how the choice of Sandleford meets this policy objective. Regardless of how many cycle routes are put in place the position of the site at the top of a long hill will prevent most people from cycling anywhere. Moreover the structure of the site as a long cul de sac encourages the use of the car for all but the most basic necessities. Trips to the Town? Car, Trips to the Train Station? Car, Getting to work? Car. Trip to Early years provision (to be provided with the Racecourse development)? Car. This along the busiest routes through Newbury which means that they will also fail to meet the objective of cutting down pollution and congestion. Indeed with these latter objectives Sandleford will add to the problems of pollution in areas where levels are already unacceptably high.

Evidence? There are currently 1280 homes in the Wash Common area and one can count the number of cyclists that go up and down Andover Road Hill on one hand. The bulk of Sandleford residents will be situated further away from town making the car far more likely to be the preferred choice of transit. That accompanied by the fact that all the big name stores now reside in the Parkway development where access to the Car park is on the north side.

Council Response

These issues have been covered in the Council's response to the representations on the consultation on the Core Strategy in light of the revised SA/SEA .

The Council accept that many people will wish to use their car but the choice of more sustainable modes of travel is important, particularly for the young and elderly who may not have access to a car. The provision of cycleways to link the development to local facilities and educational establishments and the improvement of bus services will be important provisions of the development.

There are a number of car parks on the south side of the town centre within very easy walking distance of all the facilities within the town centre. The cultural heart of the town around the Market Place (including the Library, Corn Exchange and Museum) is on the south side of the town as is the railway station which is important for commuters, particularly those travelling to Reading or London.

Consultee responses forwarded by the Say No to Sandleford Group

Consultee	Comment
Dave STUBBS	When I was involved in the earlier proposals for Sandleford, (as Police crime prevention design adviser for West Berkshire), it seemed to be a much more 'village' based scheme with its own facilities and centre - which would at least limit to sosme degree the loading on local roads and infrastructure. The current proposal appears to simply allow 2000 houses without any pressure on the developers to provide any other facilities or aleviation. I use Monks Lane and the road network to the south of Newbury (on foot, by cycle and in a car) and they are already massively overloaded and unpleasant, with significant delays and tailbacks simply to get across some junctions, and not always at peak times. Any further loading would make south Newbury untenable in terms of quality of life, access and movement.
Isobel Collyer	I find it incredible that WBC are even considering Sandleford Park. Whatever happened to the committment to using brownfield sites first, to limiting the town boundary and to sustainability? The building of the Falkland Surgery and relocation of Newbury College were obviously the thin end of the wedge. Undoubtedly WB needs affordable homes, why then did WBC allow developers to wriggle our of their obligations when redeveloping Newbury College and Parkway? Why do we fall over backwards to maximise developer profit and pay for it with our green spaces, the green lung and amenity of current residents and their descendents. We have squandered the heritage of Snelsmore Common, are we to stand by while Sandleford Park is irretrievably damaged, and our town becomes a permanent traffic jam once again? Can Newbury Town Council acting on our behalf, become a community action group and list Sandleford Park as a Local Asset under the terms of the Localism Bill? Then we can all work together to defend and preserve this valuable amenity space.
Sheila Hughes	The roads around the area can't cope with the traffic now. We don't need any more traffic up here.
Airlie Dyson	Each time I hear more about this development, the number of houses to be built has increased. I share your concern.
Mrs Hill	My main worries are the roads & other services. Andover rd is already at a standstill at scool times. There are many near miss occasions with youngsters running across the road between cars (inspite of there being a crossing). The car parking at the shops is already terrible without extra folk shopping there. If new shops

	were built this could destroy the very good shops we already have. Parking at the Falkland surgery is often very difficult, they couldn't cope with extra cars. Please lets look at brown sites instead.
Ian Dixon	The size of the development is excessive, will inundate local services and destroy the Southern aspect of Newbury. If there is a GENUINE need for more housing (and there seems to be a large number of unsold property in the area), WestBerks would better consider the construction of smaller developments around the town.
Mr Dr and mrs J Fry	This development will have an enormous effect on the countryside the wonderful landscape too much infilling again in the South of Newbury and right on the Hampshire borders. Why isn't a development of this scale planned for North of Newbury near the M 4 where the infrastructure is in place and where there has been very little development since the 50s. Do we need this scale of development in Newbury ?no we don't . It has not been thought out at all.Overcrowding of schools,doctors surgeries.and last but not least the roads. Everything seems to be piling into the South.Why?
Mrs Linda Adams	My Husband & I are strongly against West Berkshire's Council's proposal to build 2,000 houses at Sandleford Park We live at 16 Monks Lane and know how much traffic already speeds along Monks Lane, & the congestion that builds up during rush hour traffic We also have cars that speed along our service road all the time trying to avoid the cuing traffic It can take up to 5 minutes just to cross Monks Lane to go into the Collage at rush hour Weekends are a nightmare already with the traffic trying to get in & out of Tesco's & the retail park, by building another 2,000 houses this can only bring the situation to a standstill It will affect the sale of our property along Monks Lane. We have already lost one potential buyer because of the proposal We do not have the infrastructure to accommodate that volume of people or the extra traffic it will create on the south side on Newbury It would destroy this area for ever for the existing residents and for the wild life that live on the greenfield land We bought our house in Monks Lane some 12 years ago because

	of its location; overlooking greenfield land Sandleford is THE WRONG SOLUTION
Maggie Heath	Completely agree that this is the wrong place for this development. It will create mammoth traffic problems south of Newbury, with the A339 already being one of the busiest roads in the area.
Meg Thomas	The website is too complicated. You need a petition saying NO (like Avaaz use) This would take people two minutes and you would get masses of signatures We're not all a) intellectual b) time rich.
Mick Brown	It occurs to me that if this were to go ahead, Newbury just doesn't have the infrastructure to cope with the additional traffic. It will place more cars on Monks lane, a busy road and used by many school children, it will also increase traffic getting into town. It only takes one minor problem to cause major delays, such as this morning, 6th December, in the St Johns area. With the addition of the racecourse development and the lack of new roads to cope with that is just asking for major traffic problems. I also wonder how services can cope with the additional demand on water for instance. How do the schools cope as well with the additional need for places? Its too much, on what should be treated as green belt.
Monique Nash-Williams	I am completely against this development: -The infrastructure is not there: schools, surgery, and roads could not cope and the traffic is already bad (thousands extra cars would bring it to a standstill). - It would be a dreadful misuse of agricultural land (which will never be regained once it is concreted over; with the projected increase in population, we can't afford to do that when there are other solutions). - It would destroy some ancient woodland and its wildlife, which will be irreplacable. - It is much too big a project to be built in one place; smaller developments should be dotted around the town and villages through West Berkshire, also using brownfield sites, empty offices, etc. - It is only a "strategic site" to the people who do NOT live in Newbury. Things affecting Newbury, such as the Sandleford development, should be decided by people who actually live in Newbury, for the good of Newbury, and NOT by people who live at the other end of the county and do not really care about our town.
Michael Gray	I feel the proposed plan will add additional traffic to an already very congested area.You only have to see the congestion at Monks Lane/A34 at 8.30 in the morning at the moment!

	I feel the other available Brown sites should be considered before we build on unspoilt countryside
Pat Webb	With the impending Racecourse development over the next few years the infrastructure will be severely impacted. There doesn't appear to be provision for improved roads, public transport, schools (which will be badly affected), doctors' surgeries, employment opportunities,etc within the Racecourse development so how will the local area cope with another massive influx of population if the Sandleford plan goes ahead? There are many brown field sites in and around the Newbury area which at present are abandoned and an eyesore. Why can't these sites be developed first, to spread out the desired number of new houses needed and to improve the overall look of our local area at the same time?
Piers Nash-Williams	1. The infrastructure simply is not there, in terms of schools, roads, doctors' surgeries, etc., to support this number of new dwellings; 2. The approach to Newbury from the south has already been damaged by the siting of the new tip; to fill in this beautiful piece of countryside--the closest bit to Newbury--will completely ruin this area.
Roy Burnard	How in heavens name are they going to move the traffic along Monks Lane when the roundabouts at both ends are busy now. With the extra traffic from the developement it would end up in chaos. Where do they think the extra school places are coming from???
Mrs S Jones	I feel that this scale of development is not right for this green field site on the edge of Newbury. It would be far better to in fill and to use vacant office space for housing in other areas of the town at least in the short term. Also I am aware that not all the new apartments in Parkway have been taken though I do realise that this development is not yet finished. Surely if there was such a dire shortage of housing in the area there would be long waiting lists for new developments. It seems such a shame to build on this beautiful countryside. I am also very concerned as little mention has been made regarding supporting infrastructure for a development of this size such as doctors surgery, extra school places etc... The local roads will become more congested. Already Wendan Road is used as a cut through and often traffic is travelling at unsafe speeds for such residential area. I am strongly opposed to this development.
Craig Brown	As a Conservative voter, I welcome the initiative of Messrs Vickers and Swift-Hook to raise awareness of an issue that should be of great concern to local residents across Newbury and which prompted me to join the ‘sayNOtoSandleford’ group which, despite Mr Goff’s assertion that it is a political pressure group, encourages apolitical views on this issue.

	My objections to the development are manifold: The location is a prime Greenfield site There are better suited Brownfield sites that are more sustainable in our area With a potential 2,000 households (not the 1,000 Mr. Goff asserts) in the area there will be inadequate provision for education with the children of new residents added to the catchment of existing schools Social provision is already stretched. As an example, as the membership secretary for the Wash Common Scout Group, I'm acutely aware that the waiting list to join our Group includes 73 children, many of whom we will have to disappoint, a situation that will worsen with high numbers of new residents It is unclear why the Sandleford development should have leap-frogged to 2nd place over other more suitable development sites in a sustainability study that had initially seen it ranked 11th of 11. There is no provision for additional healthcare to support a further 2,000 households The employment opportunities cited are with companies that currently enjoy largely full employment such as Tesco, businesses at the retail park and the local car showrooms The only means of access to and from the site for the private vehicles of 2,000 households will be two points on Monks Lane, which already suffers significant congestion and the proposed improvements to ease the anticipated congestion are unrealistic The valid element of Mr Goff's letter is that he has raised the issue to a broader Newbury audience and his citing of the wider issues; including affordable housing, infrastructure delivery plans, economic development and conservation areas are great reminders of why the Sandleford development should not progress. I am disappointed that my letter will not be published before the date of the meeting, to aid in further informing the debate. I am sure that many people within the community would want to know why one of our finer Greenfield locations has been chosen ahead of other far more sustainable locations and be able to challenge the evaluation process to ensure that it is safeguarding the interests of all Newbury and West Berkshire residents. The cynic within me questions whether the potential 100 fold increase in land valuation that the current owner will enjoy if able to sell the site as a development parcel has anything to do with it. I would encourage a resourceful journalist at the NWN to investigate whether undue influence has been applied to those entrusted with making the decision.

Judy Winnett	I am writing with regard to the consultation that is currently taking place regarding the WBC Core Strategy. Unfortunately it appears that the council are making it extremely difficult for members of the public to air their views on this subject in an easy forthright manner. The current process is extremely intimidating, confusing and very time consuming. Even though I am computer literate and would like my opinion to be heard I am finding this process almost impossible to follow. With the potential of such large ramifications, surely it is important to ensure that the consultative process is democratic and available to everyone which includes ensuring the process is available to everyone. My understanding is that all comments need to be submitted by Friday. Unless there are alternative ways for comments to be submitted then I feel this deadline should be moved until the New Year and a more friendly, democratic submission process be made available to all members of the public.
Angela Money	I have just sent the below e-mail to: consultations@newbury.gov.uk Unfortunately, I have not got the time before the deadline to fill in all the forms etc., but I am quite happy for you to forward my comments to anyone else that you feel they should go to. Cllr Howard Bairstow will receive the other e-mail that I have sent to my neighbours. From my other e-mail address I have sent an e-mail to you saying that I could not see where to vote on the Newbury Weekly News website. Very many thanks for all that you have done. Best wishes Angela Money I wish to advise that both my husband and I are opposed to the building of 2000 houses on Sandleford. I cannot understand why

	this particular development was scored as 11th out of 11 and now it has moved up to 2nd position without any notification that I am aware of to the general public. It appears to have been carried out very underhanded. The infrastructure will not be able to cope with this size of development. I believe there is a new primary school planned but no consideration appears to have been given to the Doctors Surgery and the fact that the roads in the Andover Road and Monks Lane area are already congested at busy times of the day. Access via Warren Road for buses, cyclists and pedestrians is ludicrous. I believe that the additional properties need to be spread over a wider area and not just at Sandleford. It would be wicked to lose 42 hectares of agricultural land in this designated area. Please re-consider this idea.

Appendix G

Representation by The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement. (North Newbury)

Representation for the substitution of North Newbury for Sandleford Park in Policy CS4, together with the submission of a new master plan for the site.

The representation is summarised (page 60)

Detailed officer proposed Council response (page 60 – 62)

Council Response to:

Attachment to representation by:
Consultee: The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement.
Agent: Gerald Eve
in relation to policy CS4 in light of the changes to the SA/SEA.

Summary of comment:
Within the revised SA/SEA assessment, the Council has added more detail and reassessed the sustainability of a strategic site at Sandleford Park or North Newbury. The scoring methodology has now been altered and overall scores are not provided. Consider some of the commentary is in parts both factually incorrect and unbalanced.

New masterplan provided and other appendices - response set out in full in Appendix to responses.

All documents referred to are available, as attachments to Gerald Eve (The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement) representations available on the Consultation Portal at http://consult.westberks.gov.uk/portal/.

Officers' Recommendation:

Accompanying the representation is a draft Masterplan for the site (drawing no. SK001_B) which is slightly different to the previously received draft Masterplan (drawing no. SK001_C, received 18th March 2011 at the Examination Proposed Focused Changes consultation) with the removal of the annotation of an 'attenuation pond' for the SUD near the Vodafone roundabout. Reference in this response is to drawing no. SK001_B.

An addendum to the Flood Risk Assessment (PBA Groundwater Flooding, March 2011) and a letter from PBA on Flood Risk (December 2011) was also submitted with the representation.

As explained in the Site Selection Framework SA Policy Paper, the site selection framework, part of the SA, went out for informal consultation in 2008 to seek views on the methodology. From May to July 2009 the Council consulted on the preferred options document "Options for the Future" and its accompanying Sustainability Appraisal. This included the results of the assessment of the strategic sites using the site selection framework (Appendix 3 and 4 of the Site Selection Framework SA Policy Paper). The information from the site selection framework informed the further consideration of sites within the Strategic Sites SA Policy Paper, including the Combined Strategic Housing Sites documents phase 1 and 2. The SA uses a methodology not using scores but appraising using +/- and so one, in line with SEA guidance looking at the likely significant effects. Appendix 4 of the Strategic Sites SA Policy Paper sets out the SA of the strategic sites options first published with the "Options for the Future" document in 2009. Appendix 8 of the Strategic Sites SA Policy Paper sets out the re-assessment of the Sandleford and Racecourse, and the North Newbury and Racecourse options as they appear in Appendix 4 at the Options stage. The scoring and appraisal methodology has not been altered. The site selection framework scoring was not revisited for the revised SA as the consideration of sites has progressed beyond the use of the site selection framework and this was revised as shown in Appendix 8 of the Strategic Sites SA Policy Paper.

Taking the headings in the representation in turn:

Schools
The draft masterplan (SK001_B) fails to show how the expansion of the 'existing school' shown on the plan will be accommodated. The indicated 'existing school' is actually The Castle School which is a special needs school. Shaw-cum-Donnington Primary School is a very constrained site and surrounded by existing development. Trinity School is also on a constrained site with limited scope to be extended to the north of Love Lane.

Consultation responses and evidence provided by the Education Service indicates that there is no capacity at Shaw-cum-Donnington CP Primary School to expand so either the relocation of the school or a new primary school would be required. They also commented that Trinity is struggling to support the children currently from the catchment area so it would not be able to absorb the children generated from a strategic site at North Newbury.

Connectivity
A single carriageway footpath/cyclepath underpass below the A339 does not demonstrate connectivity for a site bisected by the dual carriageway. The Council maintains that a split site would lead to connectivity and access issues for the site as a whole.

Local facilities
A local centre, as shown on the draft masterplan, does not necessarily mean local facilities and there is no indication as to the scale and size of the centre. Village Halls have not been considered for the potential strategic sites, ensuring consistency between the potential sites, as there is no control over access to them and the provision of classes/groups/meetings held.
Vodafone is a local employer and is included in the Council's assessment.

Highways
Appendix 3 of the Strategic Sites SA Policy Paper takes the key points from the site selection framework assessment and the Combined Strategic Housing Sites Appraisal Document phase 1 (April 09). This took into account the first phase of the Council's Transport Assessment (four phases in total). Page 49 makes no reference to the site having high quality access on to the primary road network. Appendix 3 does not contradict the Highways Agency comments as their primary concern is the impact on to the Strategic Road Network (A34 and M4 in this case).

The draft masterplan is not clear enough to show how access to and from the site will be achieved for the whole site. The indication is for the use of the Vodafone roundabout from the A339 and the northern phase of the western half of the site being accessed off Oxford Road.

Sustainable Transport
Both Sandleford and North Newbury are considered to be within walking and cycling distance of the town centre. The Council therefore recognises that the North Newbury site could be accessed by foot or cycle, however it maintains that the access would not be a direct route. However, Sandleford has retail facilities directly next to it.

Impact on built environment
The Battlefields Trust have advised (at "Options for the Future") that any development between Stoney Land and the A339 should be avoided as this area saw the formation of the Parliamentary left and attack on the Royalists defending Shaw House and the hedgerows to the north east. There is therefore potential for archaeological importance which would need investigation.

The Council maintains that development would compromise the setting and character of Donnington, being located on land lower than Donnington. With residential development built up to the edge of Donnington cannot mean there is no impact.

Flood risk
The Council recognises that the flooding events in July 2007 was an extreme event. The Met Office initially predicting a return period of one in every 169 years, whilst more detailed investigation for the Thatcham Surface Water Management Plan (Feb 2010) estimates the Thatcham event to be a 1 in 237 year rainfall event.

Appendix 8 (page 83) sets out the reason for the difference in assessment in terms of flood risk for both sites. The updated text explains further the results from the SFRA level 2 and representations received in relation to the Vodafone site. The Council acknowledges the PBA flood risk assessment provides advice on the required mitigation however this does not alter the difference between the assessments of the two sites found in the SA.

Landscape
The Landscape Sensitivity Study (CD09/38, May 2009) goes on to say for North Newbury that the "openness is important in helping to maintain the character of Donnington village as separate from Newbury, and Shaw Farm Road in the east of the area has more features of seclusion and stronger rural character". The study recommends that the integrity of Donnington village should be maintained and that the character of Shaw Farm Road should be protected. Development that would encroach onto the wooded ridge is not recommended. The SA in Appendix 8 also says that "Other comments from consultation relating to landscape have stressed the impact on the gateway to Newbury from the north and the impact on Donnington village, with the loss of the gap between the settlements of Donnington and Newbury".

Open Countryside
The Council acknowledges that the draft masterplan indicates areas of open space however it does not consider these to be significant areas within this large site, particularly with areas providing a buffer zone to the A339, which would alter the SA findings.

The SA recognises in Appendix 8, page 78 of the Strategic Sites SA Policy Paper that the site is relatively close to Snelsmore Common and could provide links to the adjacent Brickkiln wood.

The Council maintains that North Newbury is not the most appropriate second strategic site in the Core Strategy and this representation does not alter these findings.

Appendix H

Representation by Pegasus Planning Group ltd on behalf of Henry Davidson Developments Ltd and TA Saunders Trustees

Detailed representation

The representation is summarised (page 64 – 73)

Detailed officer proposed Council response (page 64 - 73)

Council Response to:
Representation by Pegasus Planning Group ltd on behalf of Henry Davidson Developments Ltd and TA Saunders Trustees In relation to the Core Strategy in light of the SA/SEA

Representations made by Pegasus Planning are summarised in the table below. Full representations are available to view on the LDF Consultation Portal at http://consult.westberks.gov.uk/portal/

	Summary of Representation by Pegasus Planning	Council Response
1.3 and 1.4	Concerned that by asking for comments in relation to four very specific issues, the consultation forms issued by West Berkshire Council may have discouraged respondents from making legitimate comments on the Core Strategy in its entirety. The consultation procedure adopted by West Berkshire could therefore be open to legal challenge.	The Council set up four separate consultation exercises as this was considered to be the most appropriate way to handle the consultation process and enable analysis of the comments made. It was anticipated that there would be overlap. Consultation 1 pointed out that representations could only properly be made in the context of the Core Strategy and asked for comments in the light of the revised SA/SEA Report. This report covered all the policies within the Core Strategy and there was no intention to limit comments. Indeed many comments made no reference to the SA.
2.1	These representations are made in light of the changes to national planning policy and also reflect the updated demographic and economic evidence which has emerged since the Core Strategy was submitted in February 2010.	The Core Strategy was submitted in July 2010
2.3	Clause 143 of Localism Act 2011 amends Section 70(2) of the Town and Country Planning Act 1990 so that when determining a planning application, Local Planning Authorities (LPAs) must have regard to "local finance considerations, so far as material to the application". As demonstrated by our previous consultation response (July 2011), the New Homes Bonus can be considered a "local finance consideration". The significant level of financial loss to the West Berkshire economy, as a result of restricting its housing supply below the level of identified demand is demonstrated at Appendix 1 of representation.	The housing provision must be based on a clear understanding of housing requirements, involving preparation of a Strategic Housing Market Assessment in co-operation with neighbouring authorities. The financial incentive of the New Homes Bonus does nothing to aid this understanding and the Council has seen nothing to imply that it should be a factor in determining the housing provision. Pegasus Planning have calculated the potential New Homes Bonus using the 2008 household projection figure to demonstrate the loss to the local economy. The use of household projections in the West Berkshire context has been discussed at the hearings on 28 June

		2011, and is covered in the Examination Proposed Focused Changes Topic Paper of February 2011 available at http://www.westberks.gov.uk/index.aspx?articleid=22168. Projections are not forecasts; they merely project past rates and are not, on their own, reliable indicators for forward planning at the local level. Projections are only one factor to be considered in assessing the demand and need for housing. No new evidence supplied
2.7 to 2.9	PPS3 makes clear that the level of housing provision should be determined in collaboration with other Local Planning Authorities and stakeholders, on the basis of a strategic, evidence-based approach. The draft NPPF strengthens the importance of an up-to-date evidence base.	This is what has been done through the South East Plan process. FEPFC12 to CS1 provides for a review of housing numbers but the Council does not feel that this review can be carried out as part of the Core Strategy Examination.
2.10 to 2.12	Paragraph 48 of the draft NPPF introduces a new test of soundness 'preparing plans positively, based on a strategy which meets objectively assessed development requirements, including unmet requirements from neighbouring authorities'. In light of this new requirement the West Berkshire Core Strategy should be revised and representations made previously should be updated. West Berkshire's proposed Core Strategy housing target, does not comply with the requirements of PPS3 or the draft NPPF. The 10,500 dwelling target is based solely upon the South East Plan, which itself is based on a now out-of-date evidence base and about to be revoked. West Berkshires housing target therefore has no regard for the latest demographic and economic data available, and demonstrates no collaboration between West Berkshire and Reading Borough Council at a strategic scale. A thorough and transparent review of the evidence base has not been undertaken by West Berkshire Council and has therefore been unable to inform the authorities proposed Core Strategy. An assessment of the latest evidence for West Berkshire is therefore needed as a matter of urgency.	The housing requirement has been debated at some length at the hearings on 28 June 2011. The requirement is based on the South East Plan figure which is based on evidence and on collaboration between neighbouring authorities.
2.13	PPS3 paragraph states that Local Planning Authorities should identify enough sites to "enable continuous delivery of housing for at least 15 years". Given that West Berkshires Core Strategy will not be adopted until at least	The Council have covered this in FEPFC15.

	2012, it will only plan for housing over a remaining period of14 years.	
3	**Comments on Consultation 1** As demonstrated by our response to the previous consultation (June 2011), exceeding the number of dwellings allocated by the South East Plan will not result in West Berkshire's Core Strategy being out of conformity with the South East Plan. Regardless, the Government has made its intentions to revoke the South East Plan very clear, supported by the recent Localism Act 2011. Pegasus Planning therefore considers that the requirement to conform to the South East Plan has little consequence in practice. Constraining housing numbers to the South East Plan numbers is therefore nonsensical when evidence of housing need within West Berkshire far exceeds even the 11,000 dwellings that could be accommodated with no adverse environmental effect.	The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011. The housing requirement of 10,500 homes, though challenging for a largely rural District, was supported by the Council through the preparation of the Regional Spatial Strategy. The South East Plan has grappled with the conflicting needs and pressures for housing and the constraints to delivery and the Core Strategy is in conformity with its requirements in terms of housing provision The Council maintains that a review of housing requirements is not something to undertake during the course of the Core Strategy Examination. In line with PPS3 and with paragraph 28 of the Draft NPPF any review should be based on a clear understanding of housing requirements in the District, with preparation of a Strategic Housing Market Assessment involving working with neighbouring authorities in the housing market area. Ideally this review would be able to take account of the results of the 2011 Census and any population and household projections derived from those figures. Any review of the housing requirement would also necessitate a review of other critical elements of the evidence base.
3.4	The SA/SEA does not make clear what level of housing above the RSS target was assessed against the Councils SA objectives for option 3. Without testing specific alternative numbers of housing delivery above the South East Plan, West Berkshire are not able to take a view on all reasonable alternatives. As a very minimum we suggest that the Council should test the level of dwellings that its SHLAA identified can be provided (16,202 dwellings) against the SA Objectives.	The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test. The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the

		opportunity to remedy the breach. A hearing session was held on 31 August 2011 to discuss procedural issues with the sustainability appraisal. The Council has made clear in the SHLAA and in the discussions at the hearings that the sites identified as potentially developable in particular areas must be seen as alternatives. The total figure could not be delivered without massive implications for the environment and significant infrastructure provision.
4 4.1	**Comments on Consultation 2** **Delivering New Homes** Proposed change to Policy 1 does not go far enough to meet the clear level of need for market and affordable housing in West Berkshire, which far exceeds 10,500. Even a brief review of the latest evidence available on affordability and demographic and economic trends (see Appendices 2-6) supports this. To delay the updating of West Berkshires evidence now, will only lead to the need for an early review of the Core Strategy, and presumption in favour of development, once the final NPPF is published, which is anticipated for spring 2012.	The question of the housing requirement was covered at the hearings into the Core Strategy on 3 November 2010 and 28 June 2011 and the Council has made its position clear as regards a review of the housing requirement.
4.7	West Berkshire have amended Core Strategy Policy 1 to "at least 10,500 net additional dwellings" and claim that this enables the housing target to be exceeded both annually and post the 2026 period. However, this is somewhat contradicted by the proposed supporting text in paragraph 5.2a1 which states that "pending any review of housing numbers, an annual average net additional dwelling requirement of 525 dwellings per annum will be carried forward post 2026". We suggest that paragraph 5.2a1 is contradictory to the aims of Core Strategy Policy 1 and should therefore be removed.	The Council has made its position clear at the hearings that it cannot accept a higher housing requirement without a comprehensive review of the evidence, which will involve cross-boundary working and additional work on the technical evidence base, and can not be carried out during the course of this Examination. The proposed change is not contradictory to CS1, it carries forward the requirement beyond 2026. The requirement has always been seen as the minimum that must be planned for and this applies to the period after 2026 as well.

4	<u>AWE Aldermaston and AWE Burghfield</u> General support for revised wording.	Support noted
4.10	The Council's intention to "normally follow the ONRs advice in the inner zones" where the ONR has already indicated that it would advise against nearly all new residential developments, could be considered in contravention of the Secretary of State's position. The Secretary of State considered that whilst the ONRs role is to emphasise the potential implications of an event occurring at AWE, it is his role to weigh that advice against the planning case of the development. The Secretary of States position is considered as a reflection of national policy. It will be for the Inspector to take a view on whether the wording of this policy sufficiently allows West Berkshire Council to balance ONRs advise against the planning case for individual applications within the inner zone.	The Council does not consider that by following the advice of the ONR it would be in contravention of national policy. This was discussed at the hearings on 27 June 2011
4.11 to 4.15	Approach to development promoted by New Policy CS9 is not reflected in Delivery Plan Policy 6, which states that "The relatively low levels of growth proposed for the District [East Kennet Valley] reflects the more limited services, poorer transport connections and issues relating to the proximity of the AWE establishments". Given that no headroom for development is being set by New Policy CS9, combined with the fact that any restrictions advised by ONR will most likely only occur within the inner zone, (and these restrictions will be mitigated by future improvements - projects PEGASUS and MENSA), it would seem inappropriate to justify the low levels of growth proposed in the East Kennet Valley to 2026 by reference to the AWE establishments. Similarly, we also consider that the justification of the low growth levels proposed by reference to a lack of local services is also inappropriate given that Delivery Plan Policy 6 also seeks an improved district centre for Burghfield Common A planning application for a new district centre at Burghfield Common is due	The presence of the AWE establishments is undoubtedly a constraining factor is some parts of the EKV. The Council accepts that no headroom has been set in CS9A but the approximate housing provision has been based on the settlement hierarchy as set out in ADPP1. Any application will need to be considered in the context of the Development Plan. Pegasus's Appendix 6 examines the Council's 5 year land supply, attempting to demonstrate a shortage by comparing with a theoretical requirement of 16,000 additional homes. It seems likely that Pegasus are actually referring to appendix 7 which estimates an additional requirement of 62% in all four spatial areas, a scenario which the Council believes is totally unsustainable.

	to be submitted to West Berkshire Council for consideration during early 2012. Once delivered, a new district centre will support greater levels of growth than currently proposed for the East Kennet Valley. Therefore propose that the total dwelling target for the East Kennet Valley to 2026, as set out in Area Delivery Plan 6, be increased to 1,300. As evidenced by Appendix 6, this figure takes into account the requirement of the draft NPPF to meet affordable housing need and is still considered to be a conservative target given the restriction of development within the North Wessex Downs AONB.	
5 5.2 to 5.7	**Comments on Consultation 4** The Core Strategy fails to use a proportionate, relevant and up-to-date evidence-base ; the Berkshire HMA is out-of-date. The Government's latest 2008-based household projections show an increase of 16,000 households in West Berkshire by 2026. West Berkshire Council discredits these projections by suggesting that the levels of projected internal in-migration projected are too-optimistic given the impacts of the recent economic downturn. As demonstrated by Appendix 4, Pegasus Planning Group has assessed the demographic trends and projections for West Berkshire in some detail and has found that the majority (over two thirds) of annual population growth in the area is driven by natural change (births minus deaths). The sensitivity of the population of West Berkshire to migration is therefore limited. By planning for a reduced level of housing, on the basis of reduced internal migration, West Berkshire Council are therefore planning for a further decrease in affordability,	WBC has not discredited the household projections; they are what they are, projections not forecasts without any account of future government policy of local development policies. These issues were discussed at length at the hearings in June 2011 and were covered in the Examination Changes Topic Paper (CD08/13) . The projections are based on recent trends – based on a period that coincided with a high point in the economic cycle, high levels of in-migration and high levels of dwelling completions. The Council's Topic Paper and Pegasus Planning Fig 4.2 and 4.3 of their appendix both show the high levels of net migration in the period form 2004 to 2008 which is the period used in the population and household projections.
5.8 to 5.13	The Core Strategy fails to objectively assess and meet the housing, business, and other development needs of the area; The Berkshire HMA is out –of –date. The estimated level of need for between 560 and 850 additional affordable homes per annum is likely to be an underestimation of need. Projecting forward this level of need until 2026 is not a robust means of estimating	Covered in response to previous points. The New Homes Bonus is not a consideration in long-term planning. There is no guarantee that it will remain in place over the plan period.

	future requirements for affordable housing; nevertheless, it does demonstrate a need for between 11,200 and 17,000 affordable dwellings as a minimum. This far exceeds the total level of overall housing planned for by West Berkshire's Core Strategy. The New Homes Bonus is an un-ringfenced grant which some Local Authorities are using to support the delivery of affordable housing in their area. As demonstrated by Appendix 1, West Berkshire are losing out on up to £54,716,512 from the New Homes Bonus by planning for just 10,500 houses, instead of 16,000.	
5.14 5.25	The Core Strategy fails to support economic growth Whilst the draft Core Strategy recognises the link between economic performance and housing demand at paragraph 5.1e, it does not go on to consider this in practice, due to claims that complex commuting patterns do not facilitate a comparison of district level housing and employment. We would suggest that this is an unacceptable and unjustified position, particularly given the very clear objective of the draft NPPF to plan for sustainable development which balances land uses and therefore minimises journey lengths. The Core Strategy fails to recognise the relationship between housing and other forms of development	This was discussed at length at the hearings in November 2010 and in June 2011 and no new information has been provided in Pegasus Planning's representations.
5.26	The Core Strategy fails to take account of West Berkshire's relationship with its neighbouring authorities The future economic growth of Reading has the potential to make an important contribution to the economic recovery of the South East and nationally. However, evidence supporting Reading Borough's Core Strategy identified that Reading has historically been an importer of labour and will continue this trend if employment growth in the area remains strong. The gap between employment and workers in Reading is therefore expected to increase in the future, creating a significant demand for housing.	The Council has a strong working relationship with Reading Borough Council and the other Berkshire authorities. The Councils co-operated in the production of the Berkshire Structure Plan which contained a similar housing distribution to the adopted South East Plan The Council maintains that it is not appropriate to review the housing numbers as part of this Examination. As Pegasus point out it involves co-operation with neighbouring authorities and should therefore be considered through a review of all the evidence for the

	Through its adopted Core Strategy (2007), Reading Borough Council has committed to providing 10,930 dwellings between 2006 and 2026. However, the Inspectors report recognises that this is an ambitious figure in the context of Reading's tight boundaries, and limited suitable land for development, making it dependent upon brownfield land and windfall sites. The dependence of Reading upon its wider sub-region for the provision of an adequate labour force is therefore expected to increase. The Panel Report for the Draft South East Plan considered that a major development of some 7,500 houses could be accommodated in West Berkshire, north of the M4 and south west of Reading, without causing damage to environmental assets or causing unviable infrastructure constraints. The Secretary of State rejected the Panel's recommendation to allocate an additional 7,500 houses to West Berkshire. However, this was linked to potential problems with the identified site, rather than the overall level of housing proposed for West Berkshire. The Secretary of State therefore welcomed a review of any additional evidence on the sustainability, developability and deliverability of significantly additional growth in the Greater Reading Area. Given that an early review of the South East Plan will no longer provide the opportunity to properly consider how the needs of the Greater Reading can be met within West Berkshire, Pegasus Planning Group consider that this matter must be addressed in detail by the West Berkshire Core Strategy examination. The Duty to Co-operate within the Localism Act 2011 means that it is now a statutory requirement for West Berkshire to consider the impacts of its Core Strategy policy upon its neighbouring authorities. By ignoring West Berkshire's functional relationship with Reading and the reliance of Reading upon its neighbours to meet its shortfall in housing delivery and labour supply, the West Berkshire Core Strategy represents an unsound approach to the 'duty to co-operate'.	Housing Market Area. The proposal for a major development of 7,500 homes was not a proposal in the Draft South East Plan, nor as Pegasus point out was it supported by the Secretary of State. The site lies in the floodplain south of Reading and is no longer considered a viable site for major development. The Council has consistently pointed out the constraints in the Eastern Area, with AONB adjacent to Reading on the west and floodplain to the south. But it has not ignored the functional relationship with Reading. The Core Strategy contains numerous references to this relationship and the Council will continue to work with Reading BC in any review of planning policies for the sub-region.

5.36 to 5.42	Pegasus Planning Group considers that West Berkshire's Core Strategy is incompatible with the objectives, principles and policies of the draft NPPF. Not least, because the document fails to promote a presumption in favour of development. By restricting housing delivery to well below evidenced market and affordable need, the West Berkshire Core Strategy is failing to meet the needs of its current and future population, and is in turn restricting the areas potential economic growth, to below even that required to deliver adequate facilities and services to meet the needs of its local communities. The West Berkshire Core Strategy therefore plans for unsustainable development. The draft NPPF recognises that there is "no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly". This principle is not supported by West Berkshire's SA/SEA and Core Strategy, which limit growth in the rural areas without exploring all reasonable alternatives. Policy within the NPPF states that LPAs should prepare Local Plans with "sufficient flexibility to respond to rapid shifts in demand or other economic changes". In order to ensure a flexible provision of housing land supply, authorities should identify an additional 20 per cent of housing land upon their five year land supply identified in the SHLAA. By planning for lower than historic population and household growth (see Appendix 4), the West Berkshire Core Strategy provides no flexibility for housing delivery. Furthermore, the West Berkshire SHLAA only demonstrates 5.3 years worth of supply against its low target of 10,500 dwellings and just 4.5 years supply against the same target inclusive of the 20 per cent contingency. Against the level of need demonstrated by the 2008-based household projections, West Berkshires SHLAA demonstrates just 3.6 years without a 20% contingency (see Appendix 6). West Berkshire's Core Strategy is already out-of-date and is not consistent	The issues with regard to the housing requirement are answered above and the spatial distribution has been discussed at the hearings in June 2011. The Five Year housing land supply has been tested at appeal on three occasions within the last year and has been found to have demonstrated the requirement. The updated supply will shortly be published as an annex to the 2011 Annual Monitoring Report. If the NPPF, when finally published, retains the requirement to include an additional 20% allowance the 5 year supply will be updated to reflect the new requirement. The Council maintains that it is planning for sustainable growth as outlined in its response to the Ministerial Statement on Planning for Growth, viewable on the following webpage http://www.westberks.gov.uk/index.aspx?articleid=22820

	with the draft NPPF. A certificate of conformity, once the final NPPF is in place, will not be issued for West Berkshire's Core Strategy, and planning applications will therefore need to be determined in accord with the NPPF and its presumption in favour of sustainable development.	

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Appendix I

Equality Impact Assessment of the West Berkshire Core Strategy

July 2010

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Executive Summary

An Equality Impact Assessment (EqIA) has been undertaken for the West Berkshire Core Strategy which is the lead document in the District's Local Development Framework. The purpose of an Equality Impact Assessments is to improve the work of the Council, specifically by removing any unlawful discrimination that may be brought about by a policy and ensuring that equality is promoted. The EqIA has been completed in two stages.

The Stage 1 Initial Screening of policies demonstrated that there are no negative impacts for equality arising from the Core Strategy, and in fact, a number of policies contribute to positive equality impacts. The equality groups who may benefit are:

- Older people
- Young people
- Disabled people
- Women
- Gypsies, Travellers and Travelling Showpeople

These groups may benefit over a range of topics covered by policies in the Core Strategy including:

- Affordable Housing
- Gypsies, Travellers and Travelling Showpeople pitch provision
- Type of housing and special housing requirements
- Accessibility
- Flooding

The Stage 2 EqIA assessed all of these topics in detail to explore the positive impacts and identify any further actions or monitoring that may be required to ensure equality is promoted.

Introduction

West Berkshire Council needs to be sure that when decisions are made that affect our community and stakeholders, that the impacts on different groups of people have been considered. The purpose of an Equality Impact Assessments is to improve the work of the Council, specifically by removing any unlawful discrimination that may be brought about by a policy and ensuring that equality is promoted. Equality Impact Assessments are a requirement under the legal duties for Race Equality, Gender Equality and Disability Equality. Furthermore, the Council requires an Equality Impact Assessment to be carried out on any activity that requires a decision to be made by any of the Council's key decision making bodies.

This Equality Impact Assessment considers the potential effects of the strategic planning policies within the Core Strategy on different groups of people.

The Core Strategy is the first development plan document (DPD) within West Berkshire's Local Development Framework (LDF). It sets out a long term vision for West Berkshire up to 2026 and translates this into spatial terms, setting out proposals for where development will take place and how it will be built. The Core Strategy will affect everybody who lives, works and visits West Berkshire; therefore it is essential to ensure that it promotes equality.

Different groups of people that may be affected are known as diversity strands and these are:

- Age
- Disability
- Gender
- Race
- Religion or Belief
- Sexual Orientation

The Equality Impact Assessment of the Core Strategy has been completed in two stages:

Stage 1 involved an initial screening of all policies to check whether they could have positive or negative impacts on people within the different diversity strands. Key policy themes within the Core Strategy that could promote equality were identified and taken on to the stage 2 assessment.

Stage 2 explores the how equality is promoted through the key themes and range of policies in the Core Strategy identified in the stage 1 screening.

Stage 1 Initial Screening

The Council's corporate Equality Impact Assessment Template has been used to complete the stage 1 initial screening. As there are 26 individual policies within the Core Strategy, to ensure that a comprehensive approach has been taken, all policies have been assessed individually in the initial screening exercise. The results of the initial policy screening are in Appendix A.

The Core Strategy has been produced in phases and the initial screening was undertaken on the Proposed Submission Core Strategy (February 2010). Since then, only minor amendments have been suggested for the Submission Core Strategy, as detailed in the Schedule of Minor Amendments (July 2010) available to view at www.westberks.gov.uk/index.aspx?articleid=20689; so it has not been considered necessary to reassess the policies for effects on equality.

Equality Impact Assessment Template – Stage One

Name of item being assessed:	West Berkshire Core Strategy
Version and release date of item (if applicable):	Submission Version – 9th July 2010
Owner of item being assessed:	Liz Alexander – Planning Policy Team Leader
Name of assessor:	Alison Brook – Planning Officer
Date of assessment:	May / June 2010

1 What are the main aims of the item?

The Core Strategy is the first development plan document within West Berkshire's Local Development Framework (LDF). It sets out a long term vision for West Berkshire to 2026 and translates this into spatial terms, setting out proposals for where development will go, and how this development will be built. The Core Strategy aims to make the different settlements within West Berkshire even more attractive places within which to live, work and enjoy leisure time. The Core Strategy provides an overall framework for the more detailed policies and site specific proposals contained in other parts of the LDF.

The Core Strategy contains the following:

- An overall vision which sets out how West Berkshire should evolve over the next 20 years.
- A set of strategic objectives which expand the vision and focus on the key issues to be addressed.
- A delivery strategy for achieving these objectives which sets out how much development is intended to happen, where, when and how.
- Strategic policies for delivering the development.
- An implementation and monitoring framework.

The following strategic objectives represent the key delivery outcomes that the Core Strategy should achieve.

1. Sustainable Development

To exceed regional and national targets for carbon dioxide emissions reduction and deliver the District's growth in a way that helps to adapt to and mitigate the impacts of climate change.

2. Housing Growth

To deliver 10,500 homes across West Berkshire between 2006 – 2026 in accordance with the South East Plan. These homes will be delivered in an effective and timely manner, will maximise the use of brownfield land and access to facilities and services and will be developed at densities which make the most efficient use of land whilst responding to the existing built environment.

3. Housing Needs
To meet housing needs in a way that secures the provision of affordable and market housing to 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 needs, and respond to the changing demographic profile of the District.

4. Economy
To provide for a range of sizes and types of employment land and premises in the right locations to respond to the forecast changes in economic activity, the location of new residential development and the specific needs of the rural economy, including the equestrian and horseracing industries.

5. Infrastructure Requirements
To ensure that infrastructure needs (including community services and facilities) arising from the growth in West Berkshire are provided in a timely and coordinated manner, which has kept pace with development in accordance with the detail set out in the Infrastructure Delivery Plan.

6. Green Infrastructure
To ensure that West Berkshire contains a strong network of well-connected and multi-functional green infrastructure which provides an attractive environment to live, work and spend leisure time, providing benefits for health and opportunities for formal and informal recreation.

7. Transport
To put in place a sustainable transport network which supports the growth in West Berkshire, links existing and new development, prioritises walking, cycling and public transport and provides a genuine choice of modes. Traffic management measures will minimise the impact of new development on the existing network.

8. Retail
To achieve growth in retail activity and consequent increase in the vitality and vibrancy of town centres in West Berkshire. To meet the range of shopping needs for residents and visitors largely through the completion of the Parkway development and through the regeneration of Thatcham town centre. To provide for local shopping need in Town, District and Local centres to serve the needs of existing and future residents.

9. Heritage
To ensure that development to 2026 is planned, designed and managed in a way that ensures the protection and enhancement of the built, historic and natural environment and habitats in West Berkshire.

2 **Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this.** **(Please demonstrate consideration of all strands – Age, Disability, Gender, Race, Religion or Belief and Sexual Orientation.)**		
Group Affected	**What might be the effect?**	**Information to support this.**
Age Older People	Older people may require different types of housing or adjustments to their accommodation to enable them to live independently because they are more likely to live on their own, suffer from long term illness or disability. As a result they tend to require greater access to health services. Older people are more likely to have lower incomes and are more likely to suffer from fuel poverty. Older people are generally more reliant on public transport to access essential services and facilities than those of working age. Care homes where older people live are considered to be a 'more vulnerable' use in floods. Population forecasts indicate that the number of older people in the District is set to increase by 2026.	Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing for and Ageing Society (DCLG, 2008) www.communities.gov.uk/publications/housing/lifetimehomesneighbourhoods Positive Planning for an Ageing Society: The Berkshire Authorities Response to Lifetime Homes, Lifetime Neighbourhoods (2009) Annual Report on Fuel Poverty Statistics 2009, Department of Energy and Climate Change www.decc.gov.uk Indices of Multiple Deprivation Planning Policy Statement 25: Development and Flood Risk (DCLG), Published: 29 March 2010 http://www.communities.gov.uk/publications/planningandbuilding/pps25floodrisk Planning Policy Statement 25: Development and Flood Risk - Practice Guide (DCLG), Published 7 December 2009 http://www.communities.gov.uk/publications/planningandbuilding/pps25guideupdate ONS 2006 sub-national population projections (June 2006) West Berkshire Council Annual Residents' Surveys West Berkshire District Profile 2010,
Young People	Many younger people are less able to afford to buy their own or rent housing. The average age of first time buyers has gone up nationally and house prices in the District are higher than the national and regional averages. Younger people are also often reliant on public transport to access education, employment and training opportunities, as well as for social and leisure activities. The barriers for mobility for young people include cost and availability of public transport, especially in rural areas. Care homes where young people live are considered to be a 'more vulnerable' use in floods.	

		http://www.westberks.gov.uk/index.aspx?articleid=8406
Disability	The term 'disabilities' covers a multitude of issues, such as physical mobility and sensory problems, as well as learning difficulties. Therefore the needs of people with disabilities are wide-ranging and solutions will be different for individuals. The Core Strategy aims to address this by making helping to provide suitable accommodation in accordance with the Housing Strategy, and improving disabled access to public transport in accordance with the Local Transport Plan. People with disabilities may require specific adjustments to their accommodation to facilitate their lives. Disabled people also tend to have less accessibility as they tend to drive less and can also have problems using public transport. Disabled people can be more vulnerable in situations of flooding and PPS25 Practice Guide states that "particular attention should be given to the communication of warnings to vulnerable people including those with impaired hearing or sight and those with restricted mobility."	Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing for and Ageing Society (DCLG, 2008) www.communities.gov.uk/publications/housing/lifetimehomesneighbourhoods Attitudes of Disabled People to Public Transport: Research Study – Disabled Persons Transport Advisory Committee (2002). Planning Policy Statement 25: Development and Flood Risk (DCLG), Published: 29 March 2010 http://www.communities.gov.uk/publications/planningandbuilding/pps25floodrisk Planning Policy Statement 25: Development and Flood Risk - Practice Guide (DCLG), Published 7 December 2009 http://www.communities.gov.uk/publications/planningandbuilding/pps25guideupdate
Gender Women	Evidence from national surveys indicates that women in general have less accessibility than men due to having less access to cars and women are more likely to use public transport. The Council is committed to improving accessibility through its Local Area Agreement and the Local Transport Plan. The Core Strategy aims to improve accessibility for everyone by locating development where there is already good access to key services and facilities, safeguarding essential local services and facilities and by improving connections between communities and key services and facilities.	National Statistics 2009 Local Transport Plan 2 Accessibility Strategy 2006-2011, West Berkshire Council http://www.westberks.gov.uk/index.aspx?articleid=4401

Race Gypsies, Travellers and Travelling Showpeople	Gypsies & Travellers are an ethnic minority, whose rights are protected from discrimination by the Race Relations Act 1976 and the Human Rights Act 1998, together with all ethnic groups who have a particular culture, language or values. The accommodation requirements of Gypsies, Travellers and Travelling Showpeople need to be specifically catered for. There is evidence that additional authorised pitches are required in West Berkshire to meet identified needs. The Core Strategy sets out the criteria that will be used in considering planning applications and to identify permanent and transit sites in a later Development Plan Document. The Draft Housing Strategy 2010-2015 commits the Council to working towards identifying suitable sites and delivering new pitches , working with the local Gypsy and Traveller Community. The Race Relations (Amendment) Act 2000 places a general duty of public authorities to actively promote race equality. The Council's Race Equality Scheme 2008-2011 recognises that there is a need for equality of access to information and so consultation throughout the emergence of the Core Strategy has been published on the Council's Consultation Finder and published documents can be made available in alternative languages upon request.	Circular 01/06 (ODPM): Planning for Gypsy and Traveller Caravan Sites, February 2006 http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller Circular 04/07 (DCLG): Planning for Travelling Showpeople, August 2007 http://www.communities.gov.uk/publications/planningandbuilding/circulartravellingshow Progress Report on Gypsy and Traveller Policy (DCLG), Published 16 July 2009 http://www.communities.gov.uk/publications/housing/gypsytravellerpolicy Gypsy and Traveller accommodation needs assessment for the Thames Valley region, Association of Councils of the Thames Valley Region, September 2006.http://www.planning-inspectorate.gov.uk/pins/rss/south_east_g&t/documents/2.10ACTVaR.pdf Gypsy, Traveller & Travelling Showpeople Policy, West Berkshire Council, October 2008. http://www.westberks.gov.uk/index.aspx?articleid=15238 Draft Housing Strategy 2010-2015, West Berkshire Council, http://www.westberks.gov.uk/index.aspx?articleid=14727 Race Equality Scheme 2008-2011, West Berkshire Council.
Religion or Belief	There is no evidence available to suggest that planning or the Core Strategy impacts differently upon people according to their religion or belief.	

Sexual Orientation	There is no evidence available to suggest that planning or the Core Strategy impacts differently upon people of according to their sexual orientation.	

Further Comments relating to the item:

The main issues that are covered by the Core Strategy which could have an impact on equalities are:

- Affordable Housing
- Gypsies, Travellers and Travelling Showpeople
- Type of housing and special housing requirements
- Accessibility
- Flooding

Consultation on the Core Strategy has been widespread and given people the opportunity to comment on all these issues. Further details of how and when consultation took place are in the Statement of Consultation.

3 Result (please tick)	
✓	**High Relevance** This needs to undergo a Stage 2 Equality Impact Assessment.
	Medium Relevance This needs to undergo a Stage 2 Equality Impact Assessment
	Low Relevance This needs to undergo a Stage 2 Equality Impact Assessment
	No Relevance This does not need to undergo a Stage 2 Equality Impact Assessment

4 Identify next steps as appropriate:	
Stage Two required	Yes
Owner of Stage Two assessment:	Liz Alexander
Timescale for Stage Two assessment:	To be submitted with the Core Strategy on 9th July 2010
Stage Two not required:	

Signed: **Date:**

Stage 2 Full Equality Impact Assessment

The Stage 1 Initial Screening demonstrated that the Core Strategy has the potential to have equality impacts, and in all cases these impacts are positive. The policies of the Core Strategy have overlapping themes, so five themes were taken forward for the Stage 2 Full Equality Impact Assessment. These are:

- Affordable Housing
- Gypsies, Travellers and Travelling Showpeople
- Type of housing and special housing requirements
- Accessibility
- Flooding

A stage 2 assessment of these topics (Appendix B) identifies which policies are related to each topic; how equality is promoted through the policies; and any further actions and monitoring that are required to ensure the Core Strategy continues to promote equality.

The Stage 2 Equality Impact Assessment Template has been completed using the results of the topic assessment in Appendix B.

Equality Impact Assessment Template – Stage Two

Name of item being assessed:	West Berkshire Core Strategy
Version and release date of item:	Submission Version – 9th July 2010
Owner of the item being assessed:	Liz Alexander
Name of assessor:	Alison Brook
Date of assessment:	July 2010

1 What are the main aims of the item?

The Core Strategy is the first development plan document within West Berkshire's Local Development Framework (LDF). It sets out a long term vision for West Berkshire to 2026 and translates this into spatial terms, setting out proposals for where development will go, and how this development will be built. The Core Strategy aims to make the different settlements within West Berkshire even more attractive places within which to live, work and enjoy leisure time. The Core Strategy provides an overall framework for the more detailed policies and site specific proposals contained in other parts of the LDF.

The Core Strategy contains the following:

- An overall vision which sets out how West Berkshire should evolve over the next 20 years.
- A set of strategic objectives which expand the vision and focus on the key issues to be addressed.
- A delivery strategy for achieving these objectives which sets out how much development is intended to happen, where, when and how.
- Strategic policies for delivering the development.
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3. Housing Needs
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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 needs, and respond to the changing demographic profile of the District.

4. Economy
To provide for a range of sizes and types of employment land and premises in the right locations to respond to the forecast changes in economic activity, the location of new residential development and the specific needs of the rural economy, including the equestrian and horseracing industries.

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6. Green Infrastructure
To ensure that West Berkshire contains a strong network of well-connected and multi-functional green infrastructure which provides an attractive environment to live, work and spend leisure time, providing benefits for health and opportunities for formal and informal recreation.

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To achieve growth in retail activity and consequent increase in the vitality and vibrancy of town centres in West Berkshire. To meet the range of shopping needs for residents and visitors largely through the completion of the Parkway development and through the regeneration of Thatcham town centre. To provide for local shopping need in Town, District and Local centres to serve the needs of existing and future residents.

9. Heritage
To ensure that development to 2026 is planned, designed and managed in a way that ensures the protection and enhancement of the built, historic and natural environment and habitats in West Berkshire.

2 What research will you undertake to inform this assessment?

(for example, who, how and when will you consult? What existing information is available either internally or externally? Are there complaints, comments received that will inform this assessment? Are there any local groups you can talk to? Etc)

Use this space to set out your activity.

Policies in the Core Strategy have been developed in response to a **technical evidence base** which is available to view online at www.westberks.gov.uk/index.aspx?articleid=12144 .

In addition, **ongoing public engagement** has informed the policies in the Core Strategy.

There have been four periods of consultation:

- Options for Delivering Homes (23rd November 2007 – 11th January 2008)
- Options for Development in Rural Areas (2nd May 2008 – 13th June 2008)
- Options for the Future (22nd May 2009 – 3rd July 2009)
- Proposed Submission Core Strategy (26th February 2010 – 9th April 2010)

A range of methods were used to consult the public and these included:

- Publishing consultation material on the Council's website and making it available at the Council Offices and local libraries in the West Berkshire and Reading area
- Notifying consultees by email or post
- Providing a range of consultation material in easy to understand formats such as posters, leaflets, and newsletters;
- Giving public presentations at accessible venues around the District such as community halls (and using the loop system for people with hearing impairments);
- Workshop sessions;
- Public displays at different locations in the District including rural areas, schools, and in the main towns (on a tour bus which offered disabled access);
- Advertising in the local press and on local radio.

Initial exploratory work on the Equalities Impact Assessment was carried out prior to the consultation on 'Options for the Future' which took place from May to July 2009. At this stage, the Council began to undertake monitoring of all consultation respondents by asking them to provide some demographic details relating to the six diversity strands. This was done in two formats: a paper copy of the response form and online through the Limehouse consultation portal. The aim was to see how effective the consultation has been in reaching people from different diversity strands. The results are inconclusive because the vast majority of respondents did not provide any information. There are many reasons why people may not wish to provide the demographic data, and one of the main reasons relevant to the Core Strategy consultations is because a lot of the consultees are responding on behalf of an organisation or person, or they may be a planning agent. The list of people consulted and the demographic data for respondents for 'Options for the Future' are detailed in Appendix C, and for Proposed Submission are detailed in Appendix D.

The Statement of Community Involvement sets out how the Council will involve the community in the production of the LDF and it is available to view online at http://www.westberks.gov.uk/index.aspx?articleid=4006 .

Further information relating specifically to how consultation took place during the production of the Core Strategy, including summaries of consultation responses, is detailed in the Statement of Consultation Regulation 27 (30 (1)(d)) and the Statement of Consultation Regulation 30(1)(e) which are available to view online at http://www.westberks.gov.uk/index.aspx?articleid=20689

3 What are the results of your research?

Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this.

(Please demonstrate consideration of all strands – Age, Disability, Gender, Race, Religion or Belief and Sexual Orientation.)

The Core Strategy aims to have positive benefits for all residents of West Berkshire by locating development in sustainable locations and setting out the principles for providing the services and facilities that people need.

The Stage 1 Initial Screening showed that the Core Strategy policies promote equality for all residents of West Berkshire, and particularly the following groups of people:

- Older people
- Young people
- Disabled people
- Women
- Gypsies, Travellers and Travelling Showpeople

The results of this are in section 2 of the stage 1 EqIA template, and in Appendix A.

The Stage 2 Topic Assessment showed that equality is promoted by the way the Core Strategy tackles the following issues:

- Affordable Housing through many policies in the Core Strategy, particularly CS7 and CS8.
- Gypsies, Travellers and Travelling Showpeople through policy CS9.
- Type of housing and special housing requirements through policies CS5, CS15 and CS16.
- Accessibility through many policies in the Core Strategy.
- Flooding through policy CS17.

The results of this are in Appendix B.

4 What actions will be taken to address any negative effects?

The screening of each Core Strategy policy has been documented in Appendix A and shows that there are not likely to be any negative equality effects. This is because the Core Strategy is a planning document which aims to improve the quality of life and meet the District's needs over the long term. Some actions have been identified through the stage 2 topic assessment (Appendix B) which could further promote equality.

Action	Owner	By When?	Outcome
Partnership working with the Council's housing Dept, Housing Associations/Social Rented Landlords and planning applicants to provide affordable housing.	Planning Policy Development Control Housing	Ongoing	Meet targets for provision of affordable housing

Allocate Gypsy and Traveller sites through the Site Allocations and Delivery DPD.	Planning Policy Countryside Housing	2013	Meet demand for Gypsy and Traveller pitches
Build high quality housing that meets Lifetime Homes and Code for Sustainable Homes standards.	Planning Policy Development Control Building Control	Ongoing	Provision of a range of types of houses to meet people's needs.
Set standards for parking provision, including disabled parking.	Planning Policy Transport Policy	Initial work through Local Transport Plan by April 2011	Supplementary Planning Guidance on parking standards.
Allocate local centres through the Site Allocations and Delivery DPD.	Planning Policy	2013	Protection of local centres to serve local needs in an accessible way.

5 What was the final outcome and why was this agreed?

(Was the item adjusted, rewritten or unchanged?)

The results of the Equality Impact Assessment showed that the Core Strategy only has positive effects on equality so no amendments to the document are necessary in terms of equality.

Other issues that have arisen from the consultation have provoked a 'Schedule of Minor Amendments' to be submitted alongside the Core Strategy; however these do not have equality impacts. The Schedule of Minor Amendments is available to view online at http://www.westberks.gov.uk/index.aspx?articleid=20689

Monitoring of the Core Strategy will continue on an annual basis.

6 What arrangements have you put in place to monitor the impact of this decision?

Monitoring is a key part of the Core Strategy and the Monitoring Framework is set out in Chapter 6 of the document. The results of monitoring will be reported in the Annual Monitoring Report (AMR) which is published every December.

The following indicators are particularly relevant to equalities :

- Gross affordable housing completions
- Net affordable housing completions

- Planning applications including contribution to affordable housing
- Amount paid in financial contributions for the provision of affordable housing
- Net additional Gypsy and Traveller pitches
- Accessibility of new residential development – percentage within 30 minutes public transport time of key services and facilities such as employment, education, healthcare, shops and leisure.
- Housing mix by type and size

Previous Annual Monitoring Reports are available to view online at http://www.westberks.gov.uk/index.aspx?articleid=4148

7 What date is the Equality Impact Assessment due for Review?

July 2013 although further Equality Impact Assessment work will be undertaken for the LDF for the Site Allocations and Delivery DPD through ongoing public consultations in accordance with the Statement of Community Involvement.

Signed: **Date:**

Conclusion

The policies of the Core Strategy have been tested for their impacts on equality. The Equality Impact Assessment demonstrates that no policies have negative impacts on equality and many of the policies contribute towards promoting equality. The policies seek to promote equality and tackle issues related to the provision of affordable housing, the provision of Gypsy and Traveller pitches, adaptations to housing for different needs, improving accessibility, and reducing the risk of flooding.

Next Steps

The Core Strategy will undergo an Independent Examination in autumn 2010, before it can be adopted by the Council. Monitoring of the Core Strategy and other planning policies will continue to be reported in the Annual Monitoring Reports which are published each December.

Consideration will still need to be given to potential equality impacts as further development plan documents (DPD) are produced as part of the Local Development Framework. An Equality Impact Assessment will be undertaken for the Site Allocations and Delivery DPD prior to its submission to ensure that further planning policies do not discriminate against particular groups, and do promote equality.

APPENDIX A

Stage 1: Equality Impact Assessment – Initial Screening of Core Strategy Policies

All Policies within the Proposed Submission Core Strategy have been subject to Initial Screening for equalities effects. The table below assesses who will benefit from each policy; if the policy has the potential to cause adverse impact or discriminate against different groups of the community; and whether policies make a positive contribution to equalities. Ticks [✓] have been inserted where a policy could make a positive contribution to equalities and crosses [✗] where a policy has the potential to cause adverse impact.

Policy	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Equality Impacts
SP 1 Spatial Strategy	✓	✓	✓				This policy, with its emphasis on development in the more sustainable settlements which offer a range of services and good accessibility by public transport, walking and cycling, will have a positive impact on all residents. It will particularly benefit those who often face challenges in accessing key services such as older people, young people, disabled people, and women.

SP 2 Newbury	✓	✓	✓				This area delivery plan policy will have a positive impact on both existing and future residents. The provision of a significant number of new homes, including affordable homes will provide increased opportunities particularly for young people, young families and older people to access suitable housing. The focus on regeneration of the town centre will provide housing, employment opportunities and leisure facilities in more sustainable locations which will impact particularly on older people, young people, disabled people and women, who often face challenges in accessing key services. It will have a positive impact on the quality of life of all people who use open spaces within the town, particularly older people, young people and disabled people. The policy also puts emphasis on improved community infrastructure especially additional school provision which will impact on young people and disabled people.
SP3 Thatcham	✓	✓	✓				This area delivery plan policy will have a positive impact on both existing and future residents. This will include the provision of a significant number of new homes, including affordable homes, to create a mixed and inclusive community. This will in particular offer opportunities for young people, young families, older people to access suitable housing. The focus on regeneration of the town centre will provide housing, employment, commercial and leisure facilities in more sustainable locations which will impact particularly on older people, young people, disabled people and women, who often face challenges in accessing key services and employment. It will have a positive impact on the quality of life of all people who use open spaces within the town, particularly older people, young people and disabled people.

SP4 Eastern Area	✓	✓	✓				This area delivery plan policy will have a positive impact on both existing and future residents. The provision of a significant number of new homes, including affordable homes will provide increased opportunities, particularly for young people, young families and older people to access suitable housing. Accessibility will be improved through improvements to transport and enhancing retail, employment, community infrastructure and the environment. This will have a positive impact on the quality of life of all people in the area, particularly on older people, young people, disabled people and women, who often face challenges in accessing key services.
SP5 North Wessex Downs Area of Outstanding Natural Beauty	✓	✓	✓				This area delivery plan policy will have a positive impact on both existing and future residents. The provision of new homes, including affordable homes to meet local need will provide increased opportunities, particularly for young people, young families and older people to access suitable housing. The policy will have an impact on all people living within and visiting the AONB, particularly in terms of improving access to the countryside, services and facilities, and employment. This will be particularly beneficial to older people, young people, disabled people and women who often face challenges in accessing key services and facilities, employment opportunities and in travelling sustainably, especially when they live in rural areas.

SP6 The East Kennet Valley	✓	✓	✓				This area delivery plan policy will have a positive impact on both existing and future residents. The provision of new homes, including affordable homes to meet local need will provide increased opportunities, particularly for young people, young families and older people to access suitable housing. This policy will have a positive impact on all people who travel and access facilities and work opportunities around the East Kennet Valley, by protecting employment and improving and enhancing the provision of services and, transport links. This will be particularly beneficial to older people, young people, disabled people and women who often face challenges in accessing key services and facilities, employment opportunities and in travelling sustainably, especially when they live in rural areas.
CS 1 Delivering New Homes and Retaining the Housing Stock	✓	✓					The provision of a significant number of new homes, including affordable homes will provide increased opportunities, particularly for young people, young families, older people and disabled people to access suitable housing.
CS 2 Housing Distribution	✓	✓	✓				This policy, with its emphasis on development in the more sustainable settlements will have an impact on all residents, particularly older people, young people, disabled people, and women who often face challenges in accessing key services. The policy proposes that some housing is developed in the rural areas of the District. This will help to maintain sustainable rural communities and particularly assist young people and the elderly to access suitable affordable housing in their local area.

CS 3 Newbury Racecourse Strategic Site Allocation	✓	✓	✓				Development of this site within easy reach of Newbury town centre and with good access to the train service will provide housing in a sustainable location which will benefit residents, particularly older people, young people, disabled people, and women who often face challenges in accessing key services and facilities.
CS 4 Sandleford Strategic Site Allocation	✓	✓	✓				Development of this site within easy reach of Newbury town centre will provide housing in a sustainable location which will benefit residents, particularly older people, young people, disabled people, and women who often face challenges in accessing key services and facilities. The policy seeks provision of 40% affordable housing on the site which will particularly help young people and the elderly to access suitable affordable housing.
CS 5 Housing Type and Mix	✓	✓	✓				This policy seeks to achieve an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community, including the provision of Lifetime Homes. Factors such as housing need and demographic considerations have been addressed within the proposed dwelling mix. This should help meet the needs of specific groups such as older people, disabled people, and those households with special needs as well as families with children and single person households.
CS6: Infrastructure	✓	✓	✓				This policy will have a positive impact on all people by ensuring better access to physical, green and social infrastructure in tandem with new development. This is likely to be particularly positive for older people, young people, disabled people and women who might otherwise find it more difficult to access the different types of social infrastructure if they were not provided locally.

CS7: Affordable Housing	✓	✓					The provision of affordable homes across the District will provide increased opportunities, particularly for young people, young families and older people to access suitable housing. The provision of affordable housing also includes extra care/sheltered accommodation which can assist those with disabilities to access appropriate housing.
CS8: Rural Exception Sites	✓						The provision of affordable homes in rural areas will provide increased opportunities, particularly for young people, young families and older people to access suitable housing. The development of affordable housing in the rural areas of the District will help to maintain sustainable rural communities and particularly assist young people and older people to access suitable affordable housing in their local area.
CS9 Gypsies, Travellers and Travelling Showpeople	✓			✓			Gypsies & Travellers are an ethnic minority, whose rights are protected from discrimination by the Race Relations Act 1976 and the Human Rights Act 1998, together with all ethnic groups who have a particular culture, language or values. This policy will have a positive impact on the Gypsy and Traveller community in providing authorised sites, providing play provision for children, access to key services such as to schools, shops and to health services. In meeting the needs for authorised sites the policy will help to avoid the possibility of discrimination or a disproportionate response to the issues raised by unauthorised encampments.

CS10 Location and Type of business development	✓	✓	✓				This policy focuses on the provision of employment and is likely to be of general benefit to all community groups. The policy aims to direct business development towards sustainable locations, for example office space within town centres, which will increase accessibility and will be of particular benefit to older people, young people, disabled people, and women.
CS11 Rural Economy	✓	✓	✓				This policy focuses on the provision of employment within rural areas and is likely to be of general benefit to all community groups. The policy aims to sustain and diversify rural enterprises whilst providing local job opportunities in rural areas. This will increase accessibility and be of particularly benefit to older people, young people, disabled people, and women.
CS12 Town Centres	✓	✓	✓				Protecting and enhancing the District's network of retail centres will have a positive impact on the quality of life of residents by providing local focal points for the provision of services and facilities and by reducing the need to travel. This may be of particular benefit to the young people, older people, and people with disabilities who may face greater challenges in accessing key services and facilities. This could also be of particular benefit to women who are less likely to have access to a car than men.
CS13 Equestrian / Racehorse Industry							No equality impact.
CS14 Transport	✓	✓	✓				This policy will have an impact on all people who travel around the District, particularly older people, young people, disabled people, and women who often face challenges in accessing key services and facilities and travelling sustainably, especially when they live in rural areas.

CS 15 Design Principles	✓	✓					This policy seeks to deliver high quality and sustainable design that considers both the appearance and the way that a development scheme functions. Developments will be expected to create safe and accessible environments with appropriate green infrastructure, which will particularly benefit and met the needs of young people, young families, older people and people with disabilities.
CS16 Sustainable Construction and Energy Efficiency	✓						This policy aims to improve the sustainability and energy efficiency of new buildings which will mainly benefit the environment, however people who live in these new dwellings will benefit from reduced fuel costs especially those who maybe facing fuel poverty such as older people.
CS17 Flooding	✓	✓					The policy requires development to be safe and not increase flood risk elsewhere, this takes into account the vulnerability of land uses, such as hospitals, care homes and children's homes. Detailed flood risk assessments will need to look at flood water depth and velocities for safe access and exit for routine and emergency access under flood conditions; this will be of particular relevance to young people, older people and those with disabilities.
CS18 Biodiversity and Geodiversity	✓	✓					By conserving and enhancing biodiversity and geodiversity and increasing their accessibility, this policy will have a positive impact on the quality of life of all people within the District particularly older people, young people and those less mobile.
CS19 Green Infrastructure	✓	✓					This policy will have a positive impact on the quality of life of all people who use open spaces within the District, particularly older people, young people and disabled people.
CS20 Historic Environment and Landscape Character							No equality impact.

APPENDIX B

Stage 2: Equality Impact Assessment – Topic Assessments

Topic	Policies	Positive / Neutral / Negative Impact	How policy is mitigated if there is a negative impact	How equality is promoted through the policy	Action	Monitoring
Affordable Housing	SP2, SP3, SP4, SP5, SP6, CS1, CS2, CS3, CS4	Positive Impact	N/A	These policies are wide-ranging in their objectives and delivery targets. All the policies promote increased housing delivery in sustainable locations, including affordable housing. Therefore these policies will be of particular benefit to young people, young families and older people by providing increased opportunities to access housing.	Continue partnership working with the Council's housing Dept, Housing Associations/Social Rented Landlords and planning applicants.	The provision of affordable housing will be monitored through the AMR.
Affordable Housing	CS7, CS8	Positive Impact	N/A	These policies are focused on delivering affordable housing throughout the District in sustainable locations. They will be of particular benefit to young people, young families and older people by providing increased opportunities to access housing. Assists those on low incomes to afford rental or ownership	Continue partnership working with the Council's housing Dept, Housing Associations/Social Rented Landlords and planning applicants.	The provision of affordable housing will be monitored through the AMR.

				of affordable accommodation. Promotes the provision of extra care/sheltered accommodation for older or vulnerable people. Assists in reducing the homelessness within the District. Promotes affordable housing in rural areas creating mixed sustainable communities. Reduces social exclusion, including poor quality housing, homelessness, poor health, crime etc. Improves housing conditions and seeks the provision of decent homes of high quality design for all.		
Gypsies, Travellers and Travelling Showpeople	CS9	<u>Positive</u> The policy seeks to facilitate the provision of authorised sites.	N/A	Through facilitating the provision of authorised sites offering onsite play provision for young people, and being located within easy access of schools, shops and to health services. This will benefit families in education and give access to key services and facilities. The quality of life of those	Sites will be allocated within the Site Allocations and Delivery DPD.	The provision of Gypsy, Traveller and Travelling Showpeople sites will be monitored through the AMR.

				moving from bricks and mortar will be improved. By facilitating authorised sites this will help avoid the possibility of discrimination or a disproportionate response to the issues raised by unauthorised encampments.		
Housing Type	CS 5 CS 15 CS16	Positive These policies seek to achieve a mix of dwelling types and sizes to meet the housing needs of all sectors of the community. Developments should be designed to be safe and accessible and to meet high standards of energy efficiency.	N/A	Through seeking an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community, including those with special requirements as well as families with children and single person households. Through delivery of Lifetime Homes, designed to ensure that homes are accessible and easily adaptable to meet changing needs, particularly of the elderly and those households with special needs (CS 5) Through high quality and sustainable design that will create safe and accessible environments with appropriate green infrastructure, which will particularly benefit and meet the needs of young people, the elderly and young families.(CS 15)	Implementation through the development management system Regular monitoring and updating of the evidence base, including the Strategic Housing Market Assessment Allocation of sites through the Site Allocations and Delivery DPD will consider issues of housing type and size to reflect accessibility and evidence of housing need.	The monitoring of housing mix will be reported in the AMR

				The promotion of sustainable design and construction will result in lower maintenance costs which will particularly benefit those on lower incomes and where residents are at home for much of the day, which may include a high proportion of both elderly and young households. (CS 16)		
Accessibility	SP1, SP2, SP3, SP4. SP5, SP6, CS2, CS3, CS4, CS6, CS7, CS8, CS9, CS10, CS11, CS12, CS13, CS14, CS18, CS19	<u>Positive</u> The policies which contribute towards improving accessibility will be of benefit to everyone who lives, works or travels in the District. They will promote equality for groups who generally have lower levels of accessibility within the District including young people, older people, people with disabilities and women.	N/A	Through locating housing development in sustainable locations where people are able to access key services and facilities (SP1, SP2, SP3, SP4, SP5, SP6, CS2, CS7 CS8) Through implementation of high quality accessible public transport at strategic development sites close to Newbury town centre (SP2, CS3, CS4) Through improving infrastructure for example healthcare and education facilities and through improvements to transport infrastructure (CS6, CS14, SP2, SP3, SP4, SP5, SP6) Through providing	Travel Plans will be required to support planning proposals and they will have to address the transport needs of different user groups (young people, older people, disabled). Standards for parking will be established through the Local Transport Plan and will have to take into account the needs of affected groups, particularly disabled parking. Local centres will be identified in the Site Allocations and Delivery DPD to ensure there is good local access to meet the needs of people	The accessibility of new residential development will be monitored through the AMR to ensure that people can access key services and facilities such as employment, education, healthcare, shops and leisure.

				employment in accessible locations (CS10, CS11, CS13) Through protecting and enhancing the District's network of retail centres so that people can access services locally (CS12) Through improving the local transport network which includes public transport facilities such as disabled access at train stations, bus stops or on public transport vehicles (CS14) Through providing opportunities for leisure in accessible locations (CS12, CS13, CS18, CS19)	who live in the District.	
Flooding	CS17	<u>Positive</u> The policy takes into account the vulnerability of land uses, in accordance with PPS25, and for development in flood risk areas to be safe.	N/A	Through addressing the need for safe access and exit from a development site for routine and emergency access under certain flood conditions. Through the sequential approach looking at the vulnerability of land uses.	N/A	N/A

APPENDIX C

List of organisations consulted at 'Options for the Future' consulation (22nd May to 13th June 2009)

A2 Housing Group
AEP Webb
AFC Newbury
Alliance Environmental & Planning Ltd
Alliance Security/The Green Ltd
Animal Ltd
Anningdon Developments Ltd
Arlington Development Services Ltd
Ascroft Rae
Autism Unravelled
Barton Willmore Planning Partnership
Basingstoke and Deane Borough Council
Battens Solicitors
Battlefield Trust
Bayer plc
Baylight Properties Plc
Bell Cornwell Partnership
Berkshire Association of Local Councils
Berkshire Community Foundation
Berkshire Connexions
Berkshire Federation of Women's Institutes
Berkshire IAG
Berkshire Learning & Skills Council
Berkshire Shared Services
Berkshire West PCT
Berkshire, Buckingamshire and Oxfordshire Wildlife Trust
Biffa Waste Services Ltd
Bloor Homes
Bluechurch Ltd
Bovis Homes Ltd
Boyer Planning Ltd
Bracknell Forest Borough Council
Bradbeer Planning Ltd
Bradfield College
Bradley & Willows
Bree Day Partnership
British Red Cross
British Waterways
British Wind Energy Association
Broadway Malyan
Brunsden Associates
Bryant Homes South
BTCV
CA Sustainable Architecture
Camp Hopson & Co Ltd
Campaign to Protect Rural England (Berkshire)
CBA Wessex
Central Corporation Projects Ltd
CGMS Consulting Ltd
Charles Lucas & Marshall
Chelstone Management Ltd
Chris Thomas Ltd
Christopher Strang Associates
Cinnabar Properties
Cluttons LLP
Cold Ash Community Partnership
Colliers CRE
Common Purpose
Community Action West Berkshire
Community Council for Berkshire
Conneco
Connexions
Corpra
Council for British Archaeology
Country Land & Business Association
Countryside Properties plc and The British Land Company
Cover Construction Co Ltd
CSJ Planning Consultants Ltd
Czernin 2000 Discretionary Trust
David Wilson Homes
Defence Estate
Defence Estates Ops South
Defence Land Agency
Department for Transport
Department of Communities and Local Government
Development Planning & Design Services
Diocese of Oxford
Disabled Drivers' Motor Club
Donnington New Homes
Donnington Valley Hotel
Downland Area Youth Team
Downland Youth Network
Drivers Jonas
Elm Farm Research Centre
Elmgrove Farm
Englefield Trust
English Courtyard
English Heritage
Environment Agency
Fair Close Day Centre
Fairhurst Estate
First Great Western
Firstplan
Forestry Commission
Frankham Consultancy (Oxford) Limited
Friends of the Earth, Newbury
Fusion Online Limited
GKA
Goodman
Government Office for the South East
Graham Associates Chartered Architects
Graz Design Studio
Gypsy Council
Hampshire County Council
Handybus Operators
Hanson Aggregates

Hart District Council
Haslams
Head Teachers within West Berkshire
Headway Thames Valley
Henry Homes Plc
Hermitage Team Ministry
Highfield Developments
Highways Agency
Hills Group Ltd
Home Builders Federation
Hungerford 2010+ Town Plan
Hungerford Surgery
Hungerford Vetinary Hospital
Inkpen Rights of Way
Institute for Animal Health
Islamic Society of Britain (Berkshire Branch)
J A Pye
James & Cowper Chartered Accountants Ltd
Jephson Housing Group
Job Centre Plus
Jockey Club Estates
Joint Strategic Planning Unit
Jones Day
Kemp and Kemp
Kennet Christian Centre
Kennet District Council
Kennet Valley Park Association
King Sturge Llp
Kitewood Estates Ltd
Kris Mitra Associates Ltd
Lambert Smith Hampton
Lambourn Trainers Association
Lambourn Valley Sustainability Forum
Lane Fox
Lawn Tennis Association
Legal Services Commission
Linden Homes
Link Up Project
Living Streets
Local authorities adjacent to West Berkshire
London & Cambridge Properties Limited
Lower Bowden Ltd
M J Gleeson Group Plc
Matthews & Goodman LLP
McCarthy & Stone UK Ltd
Members of West Berkshire Council
MENCAP
Mercers Solicitors
Mobile Operators Association
Multiple Sclerosis Society
National Housing Federation
National Probation Service - Thames Valley Area
Natural England
Network Rail
New Greenham Arts Centre
Newbury & Community Primary Care Trust
Newbury & District Agricultural Society
Newbury & Hungerford CPRE
Newbury Building Society
Newbury Buses
Newbury College
Newbury Community Furniture Project
Newbury Enterprise HUB
Newbury Motor Project
Newbury Racecourse
Newbury Retail Association
Newbury Society
Newbury Town Centre Steering Group
NIS
North Wessex Downs AONB
Nuclear Awareness (NAG)
Nuclear Directorate
Nuclear Installation Inspectorate
Office of Government Commerce
Oxford Diocese
Oxfordshire County Council
Pang & Kennet Valley Countryside Projects
Pang Valley Conservation Volunteers
Paramount Housing Association Ltd
Parish and Town Councils adjacent to West Berkshire
Parish and Town Councils within West Berkshire
Parkside Housing Group
Pegasus Planning Group
Persimmon Homes South East
Persimmon Homes South East
Phillips Chartered Architect
PR Newman
Pro Vision
ProLogis
Quantel Ltd
Quintons Commercial Ltd Plc
Reading Borough Council
Reading Buses
Reading Council for Racial Equality
Reading Faith Community Leaders Group
Reading Inter Faith Group
Reading Transport Ltd
Redlands Education Trust
Reland Ltd
Renaissance Habitat Ltd
Rivar Ltd
RJPC Property Consultants
Roger Tym & Partners
Royal Berkshire Ambulance NHS Trust
Royal Berkshire Fire & Rescue Service
Royal Borough of Windsor and Maidenhead
Royal Mail (Atisreal)
RPS
RSPB
Rural Housing Trust
S&F Holdings
Sainsbury's
Samaritans
Sandtrend Ltd
Sarum Hill Trust
Savills
Scope South East & Southern Community Team
Scott Wilson Ltd
Scottish and Southern Energy

SEEDA
Sellwood Planning
SG Williams & Associates
Sheepdrove Organic Farm
Simmons & Sons
Sir Richard Suttons Settled Estates
Slough Borough Council
SmartPartners
Sony UK Ltd
South East England Regional Assembly (SEERA)
South East Forum for Sustainability
South Oxfordshire District Council
South West Regional Assembly
Sovereign Housing Association
Sovereign Housing Group
SPOKES
Sport England
Standard Life Investments
Stewart Ross Associates
Stonham Housing Association
Strutt and Parker
Stuart Michael Associates
Sulhamstead Parish Council
Sunley Group
Sustainable Developments Ltd
Sustrans
Sutton Estate
Sutton Griffin Architects
Swindon Borough Council
TA Fisher & Sons Ltd
Tadley Town Council
Taylor Woodrow Developments Ltd
Terence O'Rourke Ltd
Tesco Stores Ltd
Test Valley Borough Council
TEW Design & Management
Thames Vale Homes Ltd
Thames Valley Chamber of Commerce
Thames Valley Economic Partnership
Thames Valley Police
Thames Valley Probation
Thames Water
Thames Water Property
The British Wind Energy Association
The Coal Authority
The Edge
The Kennet & Avon Canal Trust
The National Trust
The Planning Inspectorate
The Theatres Trust
The Village Housing Charitable Trust
Thomas Homes Ltd
Thomas Merrifield
THRIVE
Tourism South East
Toynbee Housing Group
Transport 2000
Turnhams Farm Trust
Turning Point
TV Energy
Upminster Holdings Ltd
Vale of White Horse District Council
Victoria Park Nursery School
Vodafone Group
W. Cumber and Sons
Wales and West Utilities
Wasing Estate
Wasing Farm Partnership
Watermill Theatre
WAULD
WBP Transport Action Group
West Berks & Hampshire Joint Action Group
West Berkshire Chamber of Commerce
West Berkshire Disability Alliance
West Berkshire Education Business Partnership
West Berkshire Lifelong Learning Partnership
West Berkshire Minority Ethnic Forum
West Berkshire Neurological Alliance
West Berkshire Partnership
West Berkshire Ramblers
West Build Homes Ltd
West Waddy A D P
Westbuild Homes Ltd
White Young Green
Wiltshire County Council
WM Morrison Supermarkets plc
Wokingham Borough Council
Woodland Trust
Woodridge Residents Association
Woolhampton Design Centre
Workspace Group plc
Yore Homes Ltd

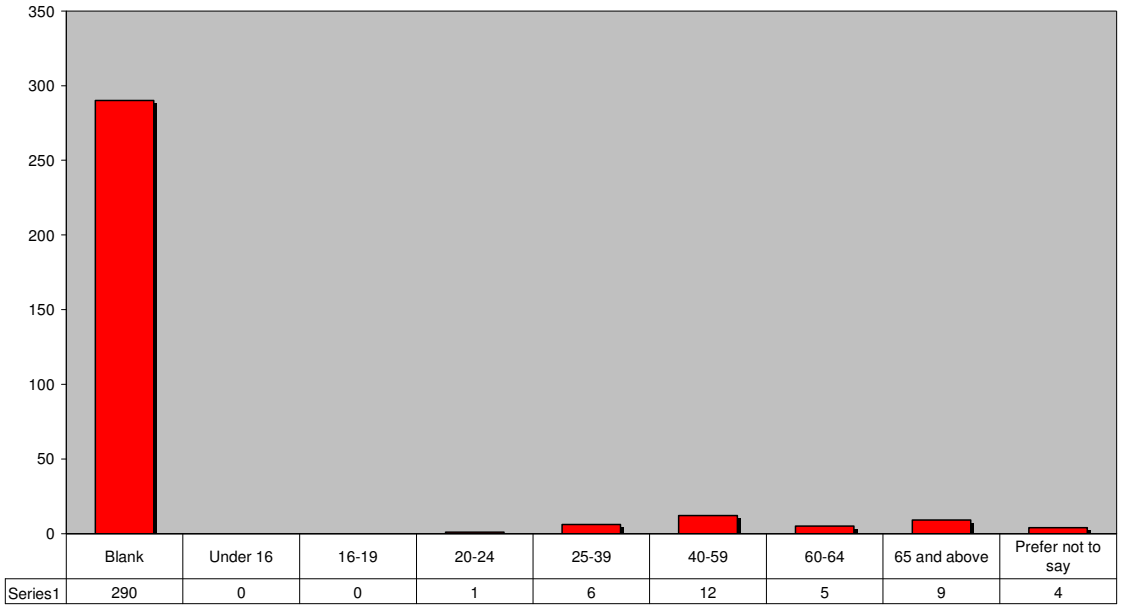
The consultation was also open to all members of the public, including those on our consultation database and was widely advertised to all across the District. Individuals are not listed in the above tables.

Demographic Data of Respondents to 'Options for the Future' Consultation (22nd May to 13th June 2009)

Age		Disability		Sex	
Blank	290	Blank	237	Blank	213
Under 16	0	Yes	7	Female	47
16-19	0	No	77	Male	67
20-24	1	Prefer not to say	6	**TOTAL**	**327**
25-39	6	**TOTAL**	**327**		
40-59	12				
60-64	5				
65 and above	9				
Prefer not to say	4				
TOTAL	**327**				

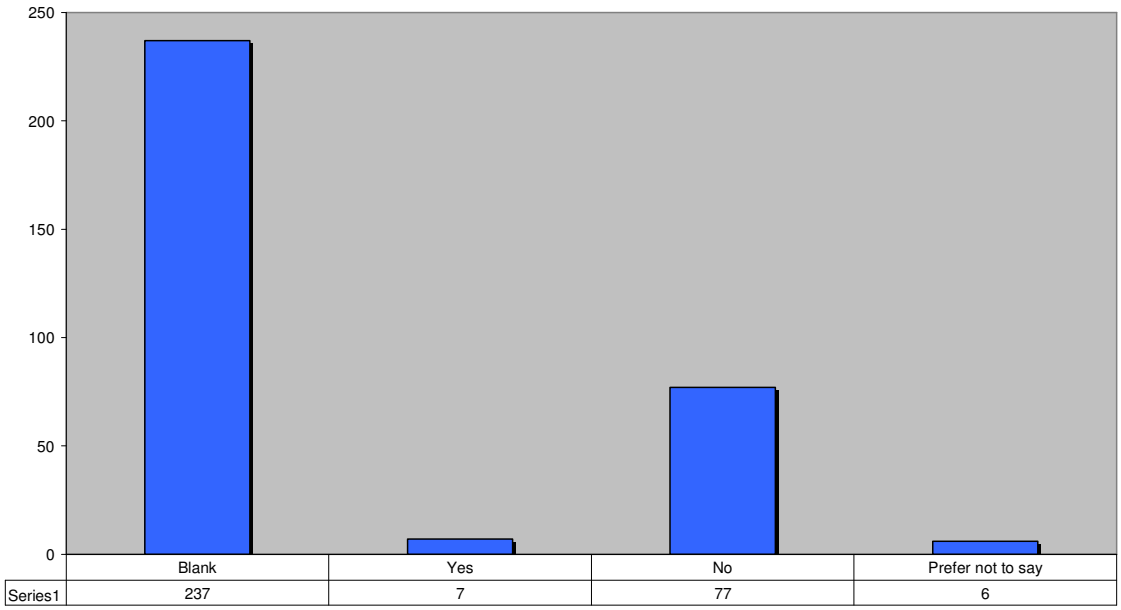
Ethnic Group		Religion or Belief		Sexuality	
Blank	237	Blank	301	Blank	301
Bangladeshi	0	Agnostic	4	Bisexual	0
Indian	0	Atheist	1	Gay / Lesbian	0
Pakistani	0	Buddhism	0	Heterosexual	19
Any other Asian background	0	Christianity	12	Other	0
African	0	Hinduism	0	Prefer not to say	7
Caribbean	0	Islam	0	**TOTAL**	**327**
Any other Black background	0	Judaism	0		
Chinese	0	Sikhism	0		
Any other ethnic background	0	None	3		
White and Asian	0	Prefer not to say	6		
White and Black African	0	Other religion or belief	0		
White and Black Caribbean	0	**TOTAL**	**327**		
Any other Mixed background	0				
British	81				
Irish	0				
Any other White background	2				
Prefer not to say	7				
TOTAL	**327**				

Age Range of Respondents



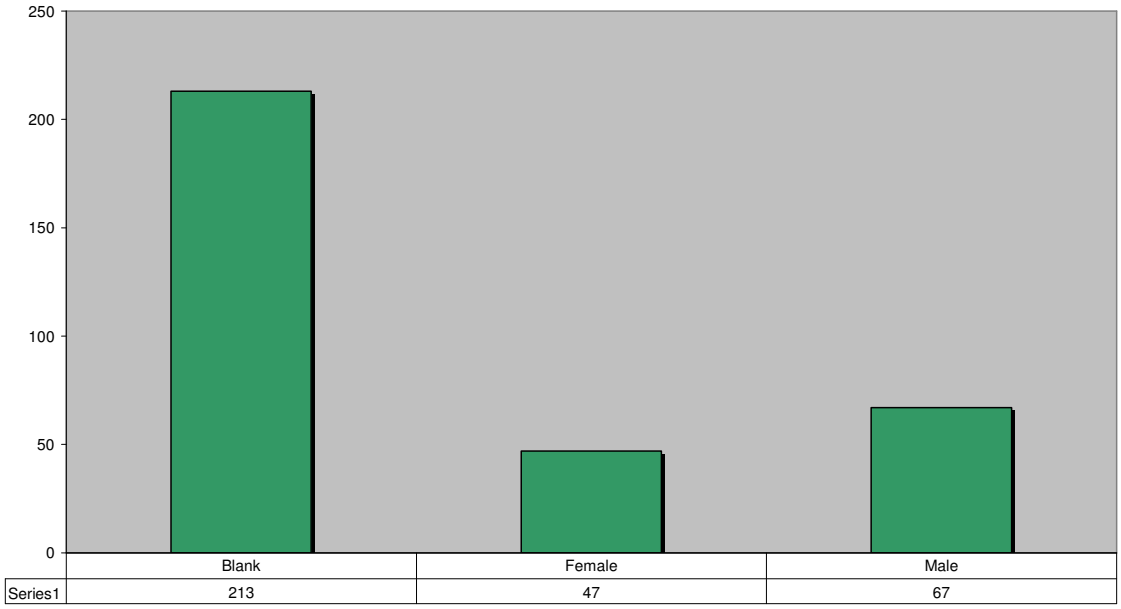
	Blank	Under 16	16-19	20-24	25-39	40-59	60-64	65 and above	Prefer not to say
Series1	290	0	0	1	6	12	5	9	4

Do respondents consider they have a disability?



	Blank	Yes	No	Prefer not to say
Series1	237	7	77	6

Sex of Respondents

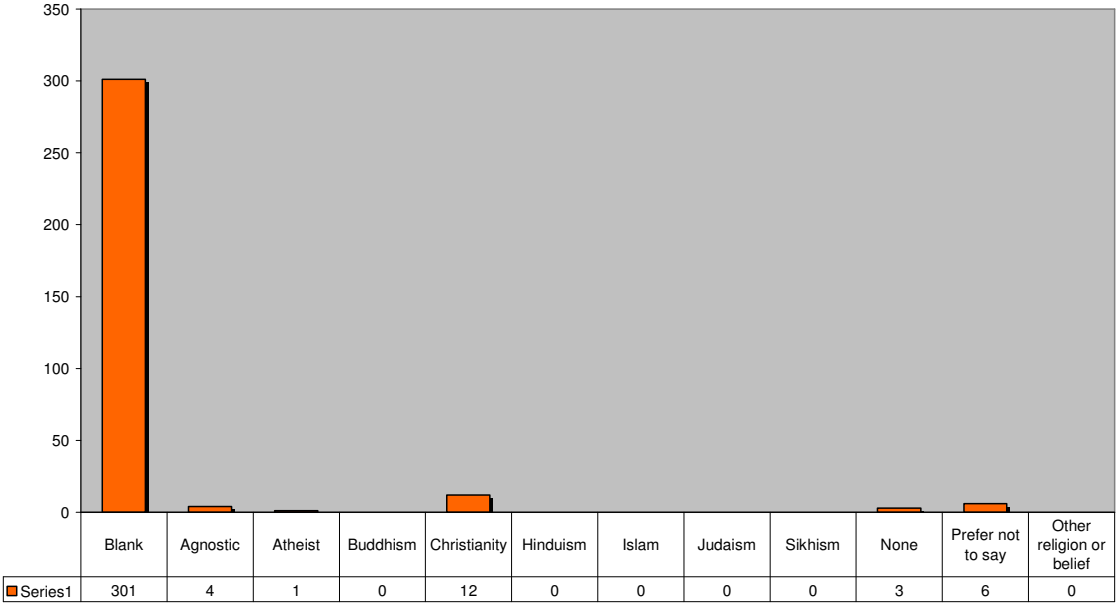


	Blank	Female	Male
Series1	213	47	67

Ethnicity of Respondents

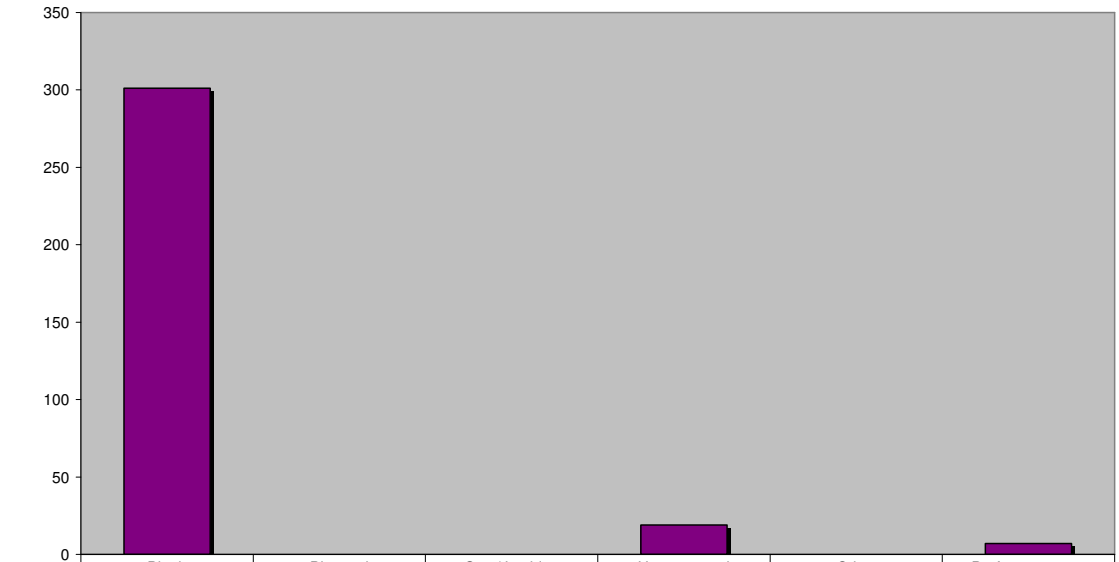
	Blank	Bangladeshi	Indian	Pakistani	Any other Asian	African	Caribbean	Any other Black	Chinese	Any other ethnic	White and Asian	White and Black	White and Black	Any other Mixed	British	Irish	Any other White	Prefer not to say
Series1	237	0	0	0	0	0	0	0	0	0	0	0	0	0	81	0	2	7

Religion or Belief of Respondents



	Blank	Agnostic	Atheist	Buddhism	Christianity	Hinduism	Islam	Judaism	Sikhism	None	Prefer not to say	Other religion or belief
Series1	301	4	1	0	12	0	0	0	0	3	6	0

Sexual Orientation



	Blank	Bisexual	Gay / Lesbian	Heterosexual	Other	Prefer not to say
Series1	301	0	0	19	0	7

APPENDIX D

List of organisations consulted at Proposed Submission consultation (26th February to 9th April 2010)

A P Hewitt
A To Z Property Developments Ltd
A2 Housing Group
Adams Hendry
AEP Webb
AFC Newbury
Age Concern
Alan & Lindsey Morring
Aldermaston Parish Council
Alliance Environmental & Planning Ltd
Alliance Security/The Green Ltd
Anchor Staying Put
Andrew Rennie
Animal Ltd
Anningdon Developments Ltd
Arthur J Hedges
Articon-Integralis
Ascroft Rae
Ashampstead Parish Planning Group
Autism Unravelled
AWE Aldermaston
Bach Homes
Barton Willmore
Basildon Parish Plan Team
Basingstoke and Deane Borough Council
Batcheller Thacker
Battens Solicitors
Battlefield Trust
BAYCP Millennium Volunteers
Bayer plc
Baylight Properties Plc
Beale Park
Bell Cornwell Partnership
Berkeley Homes (Oxford & Chiltern Ltd)
Berkshire Association of Local Councils
Berkshire Community Foundation
Berkshire Connexions
Berkshire Conservation Volunteers
Berkshire Family Mediation
Berkshire Federation of Women's Institutes
Berkshire IAG
Berkshire Learning & Skills Council
Berkshire PHAB Centre
Berkshire Relate
Berkshire Shared Services
Berkshire, Buckingamshire and Oxfordshire Wildlife Trust
Bidwells Faulkner
Biffa Waste Services Ltd
Bloor Homes
Blue Sky Apartment Ltd
Bluechurch Ltd
Boots
Bovis Homes Ltd
Bovis Homes & JA Pye (Oxford)
Boyer Planning Ltd
Bracknell Forest Borough Council
Bradbeer Planning Ltd
Bradfield College
Bradley & Willows
Bree Day Partnership
British Horse Society
British Red Cross
British Telecom
British Waterways
British Wind Energy Association
Broadway Malyan
Brookfields School
Brunsden Associates
Bryant Homes South
BTCV
Burdwood Surgery
CA Sustainable Architecture
CABE
Caldecotte Consultants
Camp Hopson & Co Ltd
Campaign to Protect Rural England (Berkshire)
CAMRA
Carter Jonas LLP
CBA Wessex
Central Corporation Projects Ltd
Centrica PLC (British Gas)
CGMS Consulting Ltd
Chapel Row Surgery
Charles Lucas & Marshall
Charles Planning Associates
Chelstone Management Ltd
Chris Thomas Ltd
Christopher Strang Associates
Cinnabar Properties
Cliff Walsingham & Co
Cluttons LLP
Cold Ash Community Partnership
Colliers CRE
Common Purpose
Communities and Local Government
Community Action West Berkshire
Community Council For Berkshire
Computer Salvage Specialists
Conneco

Connexions
Corn Exchange
Corpra
Council for British Archaeology
Council for Racial Equality
Country Land & Business Association
Countryside Properties Plc and The British Land Co
Crown Prosecution Service
CSJ Planning Consultants Ltd
CTPLD
Czernin 2000 Discretionary Trust
D V Bailey & Son
D2 Planning
David Ames Associates
David Lock Associates
David Russell Associates
David Wilson Homes
DeBretts Hair Professionals
Defence Estates
Defence Estates Ops South
Defence Land Agency
DEFRA
Department for Transport
Development Planning and Design Service Ltd
Diocese of Oxford
Disabled Drivers' Motor Club
DLP Planning Ltd
Donnington New Homes
Donnington Valley Hotel
Downland Area Youth Team
Downland Practice
Downland Youth Network
Dreweatt Neate
Drivers Jonas
Eastern Area Safer Communities Forum
Edge Architecture
Elm Farm Research Centre
Employment Services
Englefield Trust
English Courtyard
English Heritage
English Regions Cycling Development Team
Entec UK Ltd
Environment Agency
ESA Planning
Fair Close Day Centre
Falkland Surgery
Farmglade Ltd
First Great Western
Firstplan
Forestry Commission
Frampton Town Planning Ltd
Frankham Consultancy (Oxford) Limited
Freight Transport Association
Friends of the Earth, Newbury
Friends of the Pang and Kennet Valleys
Fryer Holt
Fusion Online Limited
Garden History Society
George Wimpey
George Wimpey Southern
Gerald Eve LLP
GKA
GL Hearn
Goodman
Government Office for the South East
GPP
GPSS Fisher German Consulting
Graham Associates Chartered Architects
Graz Design Studio
Greatworth Properties Plc
Greenham Common Trust
Greenpeace Group Newbury
Grundon Ltd (Waste Management)
GVA Grimley Ltd
Gypsy Council
HADCAF
Hampshire County Council
Handybus Operators
Hanson Aggregates
Hart District Council
Haslams
Hastoe Housing Association
Headway Thames Valley
Health and Safety Executive
Heaton Planning Ltd
Henry Homes Plc
Hermitage Team Ministry
Hethertons of Berkshire Ltd
HHB Architects
Highways Agency
Hills Homes Group
Hives
Home Builders Federation
Horstonbridge Ltd
Housing Corporation (South East)/HCA
Hungerford 2010+ Town Plan
Hungerford Library
Hungerford Park Estate
Hungerford Surgery
Hungerford Environment & Planning Committee
Hungerford Veterinary Hospital
I.E. Properties Ltd
Indigo Planning Ltd
Inkpen Rights of Way
Institute for Animal Health
Integrated Buildsing Consultancy Limited

Islamic Society of Britain (Berkshire Branch)
James & Cowper Chartered Accountants Ltd
Jephson Housing Group
Jesus College
Job Centre Plus
Jockey Club Estates
Joint Strategic Planning Unit
Jones Day
Kemp and Kemp
Kennet & Avon Canal Trust
Kennet Christian Centre
Kennet District Council
Kennet Properties Limited
Kennet Shopping
Kennet Valley Park Association
King Sturge Llp
Kintbury & Woolton Hill Practice
Kitewood Estates Ltd
Kris Mitra Associates Ltd
Lambert Smith Hampton
Lambourn Surgery
Lambourn Trainers Association
Lambourn Valley Sustainability Forum
Lawn Tennis Association
Legal Services Commission
Lennon Planning Ltd
Levvel Ltd
Lewis & Co Planning
Linden Homes
Link Up Project
Living Streets
Local Authorities adjacent to West Berkshire
Local Voices Environmental Group
LPC (Trull) Ld
M J Gleeson Group Plc
Mark Leedale Planning
Matthews & Goodman LLP
McCarthy & Sons
MENCAP
Mercers Solicitors
MM3 Design
Mono Consultants Ltd
Moorside Community Centre
Motor Neurone Disease Association
Multiple Sclerosis Society
N J Doyne Ltd Plant Hire
Nathaniel Lichfield & Partners
National Farmers' Union
National Grid
National Housing Federation
National Playing Fields Association
National Probation Service - Thames Valley Area
Natural England
Network Rail
New Greenham Arts Centre
Newbury & Community Primary Care Trust
Newbury & District Agricultural Society
Newbury & Hungerford CPRE
Newbury & Thatcham Hard of Hearing Club
Newbury Building Society
Newbury Buses
Newbury College
Newbury Community Furniture Project
Newbury Community Resource Centre
Newbury Enterprise HUB
Newbury Job Centre Plus
Newbury Motor Project
Newbury Racecourse
Newbury Retail Association
Newbury Society
Newbury Town Centre Steering Group
Newbury YMCA
NHS South Central
NIS
North Wessex Downs AONB
Northcroft Leisure Centre
Northcroft Surgery
Nuclear Awareness (NAG)
Nuclear Directorate
Nuclear Installation Inspectorate
Office of Government Commerce (Property Advisors to the Civil Estate)
Open Spaces Society
Ormonde Centre
Oxford Diocese
Oxfordshire County Council
P M Platt & A Barron
Pang & Kennet Valley Countryside Projects
Pang Valley Conservation Volunteers
Paramount Housing Association Ltd
Parish and Town Councils adjacent to West Berkshire
Parish and Town Councils within West Berkshire
Parkside Housing Group
Peacock & Smith
Pegasus Planning Group
Persimmon Homes
Peter M Mason
Phillips Chartered Architect
Planning Issues Ltd
Planning Potential Ltd
Plenty
PR Newman
Princess Royal Trust West Berkshire Carers Services
Pro Vision Planning & Design
Quantel Ltd
Queensgate Homes
Quintons Commercial Ltd Plc

Ramblers Association, Pang Valley Group
Ramblers Association, West Berkshire Group
Rapleys
Readibus
Reading & West Berkshire Magistrates Court
Reading Borough Council
Reading Buses
Reading Community Enterprise Agency
Reading Council for Racial Equality
Reading County Court
Reading Faith Community Leaders Group
Reading Gospel Hall Trust
Reading Inter Faith Group
Reading Transport Ltd
Redrow Homes
Renaissance Habitat Ltd
Richard Bishop & Partners
Rivar Ltd
RJPC Property Consultants
Road Haulage Association
Roger Miles Planning Limited
Roger Tym & Partners
Royal Berkshire Ambulance NHS Trust
Royal Berkshire Fire & Rescue Service
Royal Borough of Windsor and Maidenhead
Royal Mail (Atisreal)
RPS Group
RSPB
Rural Housing Trust
Samaritans
Savills
Scope South East & Southern Community Team
Scott Wilson Ltd
Scottish and Southern Energy
Second Site Properties (British Gas Property)
SEEDA
Sellwood Planning
SG Williams & Associates
Sheepdrove Organic Farm
Shire Consulting
Simmons & Sons
Sir Richard Suttons Settled Estates
Slough Borough Council
SLR Consulting Ltd
Sony UK Ltd
South East England Partnership Board
South East England Regional Assembly
South East Forum for Sustainability
South Oxfordshire District Council
South West Regional Assembly
South West Regional Development Agency
Southern Electric
Sovereign Housing Association
SPOKES
Sport England
St. Gabriel's
Stewart Ross Associates
Stonham Housing Association
Streatley Preservation Action Group
Stroke Care for Newbury & District
Strutt and Parker
Stuart Michael Associates
Sunley Estates Plc
Sustainable Development Commission
Sustainable Developments Ltd
Sustrans
Sutton Griffin Architects
Swindon Borough Council
Tarmac Heavy Building Materials
Tarmac Southern
Taylor Wimpey/Bryant
Terence O'Rourke Ltd
Tesco Stores
Test Valley Borough Council
Tew Design & Management
Thames Vale Homes Ltd
Thames Valley Chamber of Commerce
Thames Valley Economic Partnership
Thames Valley Police
Thames Valley Probation
Thames Water
Thames Water Property
Thames Water Utilities Ltd
Thatcham Vision Steeting Group
The British Wind Energy Association
The Coal Authority
The Edge
The Fairhurst Estate and JSF Accumulation and Maintenance Settlement Trust
The Home Builders Federation
The Kennet & Avon Canal Trust
The Kings Coffee Shop
The Living Rainforest
The National Trust
The Planning Bureau Limited
The Planning Inspectorate
The Property Search Group
The Theatres Trust
Thomas Homes Ltd
Thomas Merrifield
THRIVE
Tourism South East
Town & Manor of Hungerford
Toynbee Housing Group
Transport 2000
Turley Associates
Turnhams Farm Trust

Turning Point
TV Energy
Upminster Holdings Ltd
Vail Willliams
Vale of White Horse District Council
Victoria Park Nursery School
Viewpoint Design
Vodafone Group
Waitrose
Wales and West Utilities
Walkers Snack Foods Ltd
Warden Housing Association
Wasing Estate
Watermill Theatre
WAULD
WBP Transport Action Group
West Berks & Hampshire Joint Action Group
West Berkshire Alzheimers Society
West Berkshire Building Plans
West Berkshire Chamber of Commerce
West Berkshire Council Archaeology Service
West Berkshire Disability Alliance
West Berkshire Education Business Partnership

West Berkshire Lifelong Learning Partnership
West Berkshire Minority Ethnic Forum
West Berkshire Neurological Alliance
West Berkshire Partnership
West Berkshire Ramblers
West Build Homes Ltd
West Waddy ADP
White Young Green Planning
Wiltshire County Council
WM Morrisson Supermarkets plc
Wokingham Borough Council
Woodland Trust
Woodridge Residents Association
Woolhampton Design Centre
Workspace Group plc
WSP
Xtrac Ltd
Yattendon Estates
Yore Homes Ltd

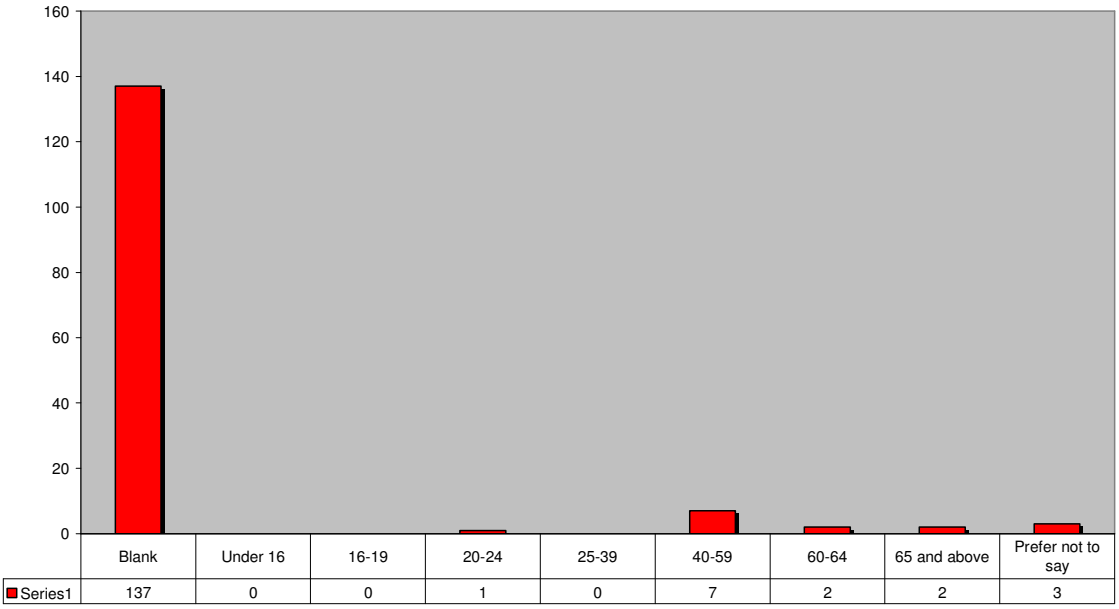
The consultation was also open to all members of the public, including those on our consultation database and was widely advertised to all across the District. Individuals are not listed in the above tables

Demographic Data of Respondents to Proposed Submission Core Strategy Consultation (26th February to 9th April 2010)

Age		Disability		Sex	
Blank	137	Blank	136	Blank	134
Under 16	0	Yes	0	Female	6
16-19	0	No	14	Male	12
20-24	1	Prefer not to say	2	**TOTAL**	**152**
25-39	0	**TOTAL**	**152**		
40-59	7				
60-64	2				
65 and above	2				
Prefer not to say	3				
TOTAL	**152**				

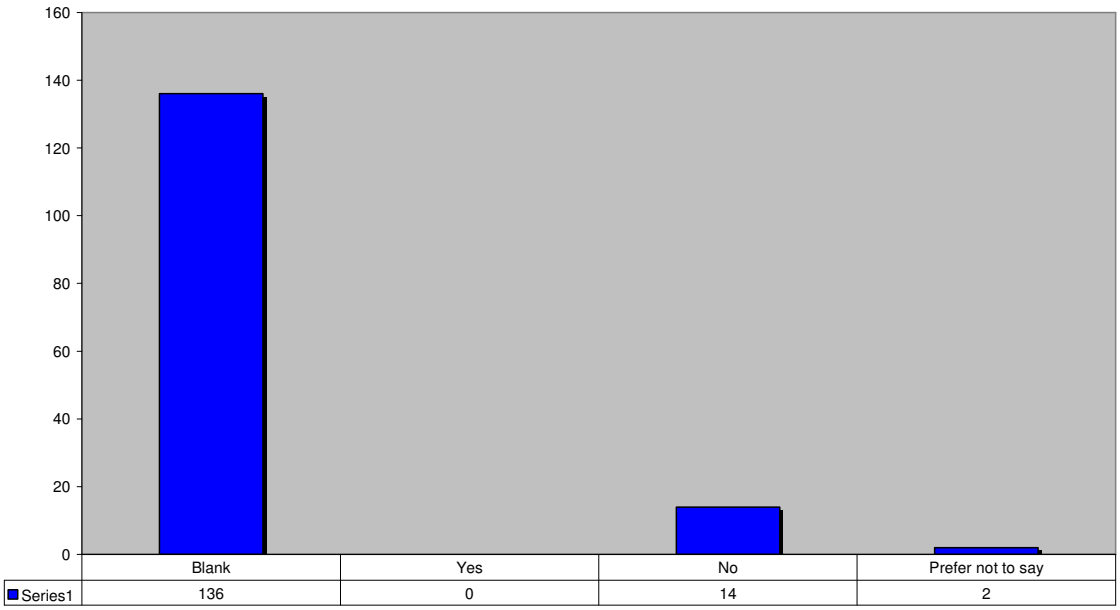
Ethnic Group		Religion or Belief		Sexuality	
Blank	136	Blank	137	Blank	137
Bangladeshi	0	Agnostic	1	Bisexual	0
Indian	0	Atheist	1	Gay / Lesbian	0
Pakistani	0	Buddhism	0	Heterosexual	8
Any other Asian background	0	Christianity	5	Other	0
African	0	Hinduism	0	Prefer not to say	7
Caribbean	0	Islam	0	**TOTAL**	**152**
Any other Black background	0	Judaism	0		
Chinese	0	Sikhism	0		
Any other ethnic background	0	None	1		
White and Asian	0	Prefer not to say	7		
White and Black African	0	Other religion or belief	0		
White and Black Caribbean	0	**TOTAL**	**152**		
Any other Mixed background	0				
British	12				
Irish	0				
Any other White background	0				
Prefer not to say	4				
TOTAL	**152**				

Age Range of Respondents



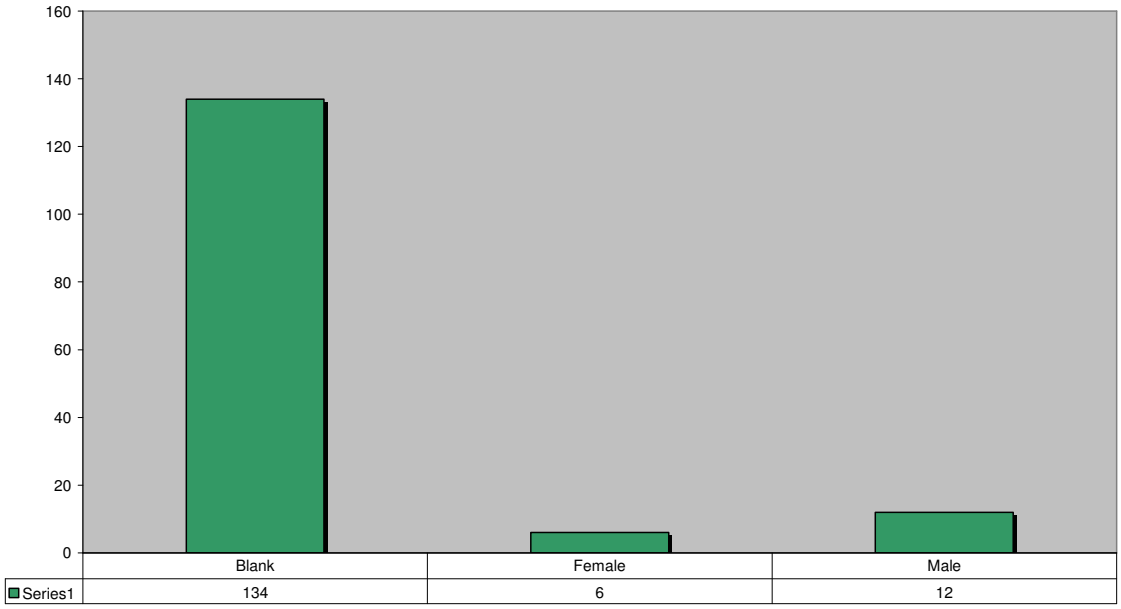
	Blank	Under 16	16-19	20-24	25-39	40-59	60-64	65 and above	Prefer not to say
Series1	137	0	0	1	0	7	2	2	3

Do respondents consider they have a disability?



	Blank	Yes	No	Prefer not to say
Series1	136	0	14	2

Sex of respondents

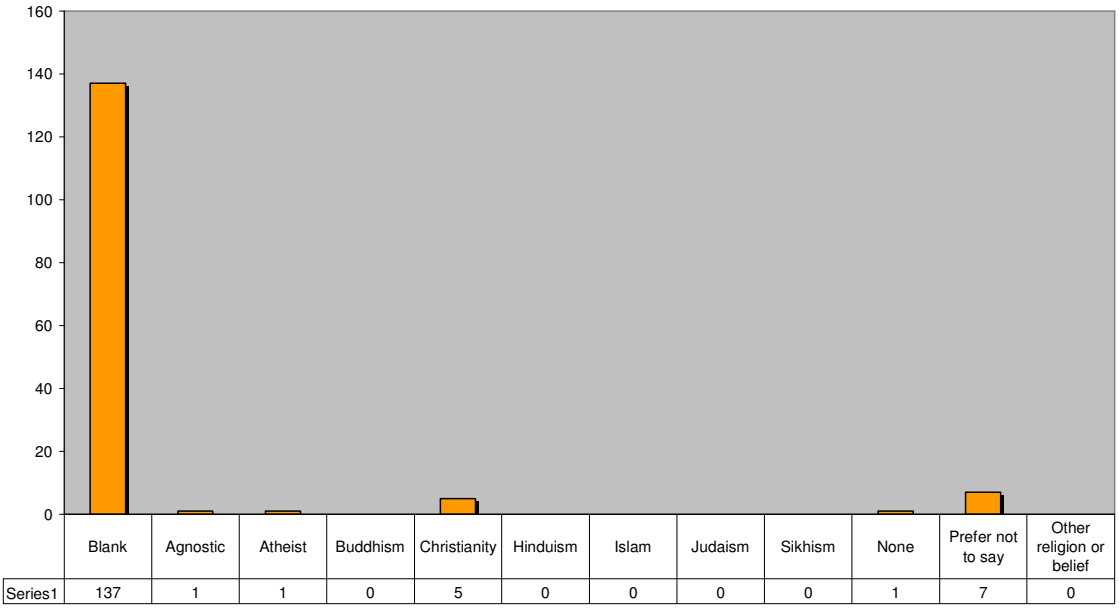


	Blank	Female	Male
Series1	134	6	12

Ethnicity of Respondents

	Blank	Bangladeshi	Indian	Pakistani	Any other Asian	African	Caribbean	Any other Black	Chinese	Any other ethnic	White and Asian	White and Black	White and Black	Any other Mixed	British	Irish	Any other White	Prefer not to say
Series1	136	0	0	0	0	0	0	0	0	0	0	0	0	0	12	0	0	4

Religion or Belief of Respondnets



	Blank	Agnostic	Atheist	Buddhism	Christianity	Hinduism	Islam	Judaism	Sikhism	None	Prefer not to say	Other religion or belief
Series1	137	1	1	0	5	0	0	0	0	1	7	0

Sexual Orientation

	Blank	Bisexual	Gay / Lesbian	Heterosexual	Other	Prefer not to say
Series1	137	0	0	8	0	7