

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	<p>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.</p> <p>West Berkshire Council policy states: New homes should be primarily developed on suitable previously developed land within settlement boundaries.</p> <p>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.</p> <p>To overcome the issues, further</p>	<p>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.</p> <p>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.</p> <p>The Site Allocations and Delivery DPD will examine further the potential for re-allocation of protected employment areas.</p>

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				consideration of residential development on brownfield sites within the current town boundaries is required.	
The Theatres Trust		Not specified	Not specified	<p>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.</p> <p>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.</p> <p>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.</p>	<p>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.”</p> <p>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.</p>

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Mr Garth Simpson		Not specified	Not specified	<p>Thattham 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.</p> <p>Easing settlement boundaries between Thattham/Cold Ash and Shaw/Ashmore Green will have an impact upon infrastructure and transport infrastructure.</p>	<p>FEPFC13 to Policy CS1 states that greenfield sites will need to be allocated adjoining settlements in all four of the spatial areas, so Thattham has not had different treatment in this regard.</p> <p>Allocations of residential sites adjoining Thattham 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.</p>
Basingstoke & Deane Borough Council		Not specified	Not specified	<p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>

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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	<p>Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work.</p> <p>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.</p> <p>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-</p>

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				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	<p>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.</p> <p>RenewableUK therefore suggests that the wording be amended to say "contribute as much as possible towards national targets...".</p>	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.

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				<p>dwelling figure could present problems in relation to the assessment of in combination effects when HRAs are undertaken by neighbouring authorities.</p> <p>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.</p>	
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	<p>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.</p> <p>The Council maintains that a review of housing</p>

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				<p>existing infrastructure.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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Further Examination Proposed Focused Change 3 (FEPFC 3)					
Policy ADPP1 Spatial Strategy (Page 19)					
Hampshire County Council		No	Yes	<p>Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work.</p> <p>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.</p> <p>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.</p>

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				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	<p>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.</p> <p>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.</p> <p>Our earlier representations (para. 3.5.3, Main</p>	<p>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.</p> <p>Support for inclusion of 'at least' is noted.</p> <p>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.</p> <p>Support for inclusion of 'suitable' is noted.</p>

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				<p>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.</p> <p>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.</p> <p>We also consider the insertion of the word 'suitable' to clarify the priority of developing brownfield land an appropriate addition to para. 3.10.</p>	
Great Auclum Estate	Barton Willmore	No	Not specified	<p>The Core Strategy should set out a higher housing figure or 'target range' than is currently presented within the document.</p> <p>The approach to delivering growth in the eastern part of the district is unsound in the context of the revised SA.</p>	<p>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.</p> <p>The Eastern Area has been defined to reflect the relationship to Reading and the Council believes that</p>

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				<p>The spatial strategy should be expanded to reflect option 5 (of the SA) which allows for growth of the Eastern Area at Burghfield Common.</p>	<p>Burghfield Common is more appropriately included in the East Kennet Valley spatial area.</p>
<p>HDDL and the TA Saunders Trust</p>	<p>Pegasus Planning Group</p>	<p>No</p>	<p>No</p>	<p>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.</p>	<p>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.</p> <p>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</p>

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					a review of other critical elements of the evidence base.
A2 Housing Group & Angus Janaway	Barton Willmore	No	Yes	<p>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.</p> <p>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.</p> <p>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.</p> <p>The wording of the ADPP policies (with the exception of ADPP5) should be reworded to</p>	<p>Support for inclusion of 'at least' is noted'</p> <p>Support for revisions to Policy CS1 is noted.</p> <p>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.</p>

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				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.

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				<p>Hill would harm the character of the area and the setting of the North Wessex Downs AONB over a significant area of viewpoints).</p> <p>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.</p>	
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

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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	<p>The proposed change is:</p> <p>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.</p> <p>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.</p> <p>c) Compromising site selection flexibility: there are only three sites adjoining the Thatcham settlement boundaries which are</p>	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).

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				<p>classed as potential strategic sites / urban extensions. This change focuses the site allocations DPD too strongly on these sites.</p> <p>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.</p> <p>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.</p>	
Cold Ash Parish Council		No	Yes	<p>Core Strategy in general terms acceptable, and sustainability element sound in most instances.</p> <p>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.</p>	<p>This change was requested, for consistency, by the Inspector. The SHLAA has not identified sufficient sites to accommodate the requirement on previously developed land.</p> <p>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.</p>

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				<p>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.</p> <p>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).</p> <p>Concerns over infrastructure capacity, increase in the level of traffic (and subsequent damage to minor roads), and lack of public transport.</p> <p>Policy APP3 should be deleted.</p>	
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

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				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)					

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Policy ADPP4 Eastern Area (Page 28)					
W. Cumber and Sons	Savills	No	Yes	<p>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.</p> <p>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.</p>	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

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				<p>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.</p>	<p>be need to be programmed to be delivered in the latter part of the plan period.</p>
<p>Further Examination Proposed Focused Change 8 (FEPFC 8)</p>					
<p>Spatial Policy SP4 (Page 30)</p>					
<p>Capital Corporation Projects Ltd</p>	<p>Bell Cornwell</p>	<p>Not specified</p>	<p>Not specified</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Support for changes to ADPP4 noted.</p>

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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

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p>	<p>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.</p>
<p>Gerald Palmer Eling Trust</p>	<p>West Waddy ADP</p>	<p>No</p>	<p>Not specified</p>	<p>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.</p> <p>A policy that not only severely limits the amount of development, but additionally puts a cap on it, has no in-built flexibility.</p>	<p>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.</p> <p>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.</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
North Wessex Downs AONB		No	Yes	<p>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.</p> <p>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 its special landscape qualities'. 'Sustainable growth' is not the purpose of AONBs.</p> <p>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.</p> <p>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.</p>	<p>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:</p> <p>'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.'</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					<p>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.</p> <p>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.</p> <p>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.</p>
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

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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	<p>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.</p> <p>It is unclear what proportion of the allocation will be captured in the Site Allocations and Delivery DPD.</p> <p>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.</p> <p>The issue of how development outside the AONB, but may still affect the AONB has not been addressed.</p>	<p>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:</p> <p>‘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</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p>	<p>of the landscape will be the paramount consideration in assessing these sites.'</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Preference for FEPFC9 over FIPFC1 noted.</p>
Croudace Strategic Ltd	Boyer Planning Ltd	Not specified	Not specified	<p>We support the Inspector's proposed wording for the changes to the first bullet point of the ADPP5. Notwithstanding this, we</p>	<p>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</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p> <p>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.</p> <p>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.</p>	<p>provision of housing is subject to the overarching objective of conservation and enhancement of the landscape qualities of the AONB.</p> <p>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.</p>
Further Examination Proposed Focused Change 10 (FEPFC 10)					
Policy ADPP6 The East Kennet Valley (Page 37)					
Mrs Rebecca Keen		No	Yes	<p>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</p>	<p>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</p>

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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	<p>Evidence of joint working is required regarding the identification of appropriate sustainable transport solutions, in particular related to traffic growth on the A339.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>A core document 'Sandleford Traffic Distribution into Hampshire' (CD10/67) was prepared as part of this work.</p> <p>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.</p> <p>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.</p>

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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

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
					<p>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.</p> <p>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.</p> <p>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.</p>
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.

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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)					

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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)					

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Mrs Elaine Hare, Thatcham Town Council		No	Yes	<p>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.</p> <p>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.</p>	<p>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.</p>
W. Cumber and Sons	Savills	No	Yes	<p>Support the insertion of the sentence "greenfield sites will need to be allocated...".</p> <p>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.</p>	<p>Support noted.</p> <p>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.</p>
Capital Corporation	Bell Cornwell	Not specified	Not specified	We welcome and support the acknowledgement that greenfield sites will	Support noted

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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.

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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

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Property				<p>development locations evolve, so will the water and sewerage infrastructure needs of the development. Thames Water also suggest some additional wording to be added to policy CS6 and its supporting text as follows:</p> <p>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:</p> <p>Proposed addition to Infrastructure Policy or text for new Water/Waste Water Infrastructure Policy</p> <p>The Council will.....</p> <p>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.</p>	<p>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.</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p> <p>Text along the following lines should be added to the Core Strategy to support the above proposed Policy :</p> <p>"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</p>	

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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	<p>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.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>This issue was extensively discussed after the Boundary Hall decision was issued (CD10/96) at the examination on the 27 June 2011.</p>

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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.	<p>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</p> <p>Para 403 of the Inspectors decision notice states <i>“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”</i>.</p> <p>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.</p>
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.

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p>	
<p>HDDL and the TA Saunders Trust</p>	<p>Pegasus Planning Group</p>	<p>No</p>	<p>No</p>	<p>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</p>	<p>The Council disagrees with this interpretation of the Boundary Hall decision notice, which the Council regards as site specific.</p> <p>The issue has been debated at length after the Boundary Hall decision was issued (CD10/96) at the examination on the 27th June 2011</p> <p>Para 403 of the Inspector's decision notice (CD10/96) states <i>"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"</i>.</p>

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				<p>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 advice against the planning case for individual applications within the inner zone.</p> <p>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.</p>	<p>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.</p>
Mr Hugh Dalgleish		No	Yes	<p>Comment refers to Appendix C</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Council agrees.</p>

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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.</p> <p>Boundary Hall decision does not support removal of constraints against DEPZ developments.</p>	
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

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
				<p>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'.</p> <p>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'.</p> <p>The following wording changes are suggested:</p> <p>CS10(a) (middle of page 73), insert after "Proposals for non town centre uses" the new words "(including housing)".</p> <p>CS10(b) Add after "other than B class uses " (penultimate line page 73) new words "and even new housing".</p> <p>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</p>	<p>deliver the Core Strategy.</p> <p>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.</p> <p>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.</p> <p>Note: Two attached documents to this representation – the Council's response to these documents can be found in the Appendix to the responses.</p>

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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	<p>The proposed focused change is unsound because it is not effective or consistent with national policy.</p> <p>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 developmentsenable 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".</p> <p>Employment land should be promoted for</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout</p>

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				<p>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.</p>	<p>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.</p> <p>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.</p> <p>The Site Allocations and Delivery DPD will examine further the potential for re-allocation of protected employment areas.</p>
W. Cumber and Sons	Savills	No	Yes	<p>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.</p>	<p>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.</p> <p>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.</p>
Vodafone Ltd	Colliers International	No	No	<p>The policy has not been positively prepared therefore fails test within NPPF. There is no</p>	<p>Policy CS10 clearly states that business development will be supported on existing employment sites, particularly</p>

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				<p>clear vision for the Vodafone site or consideration of development post 2011.</p> <p>Policy CS10 should be amended to reflect the NPPF, and in turn policy ADPP2 (forth bullet point) will need to be changed.</p> <p>The Vodafone site should be referenced in the policy or in a separate bespoke policy to reflect the NPPFs thrust on the local economy.</p> <p>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.</p> <p>The policy should be amended to:</p> <p>Remove the sequential approach to offices;</p> <p>To ensure that planning polices avoid the long term protection of employment land or floorspace; and that</p> <p>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</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>

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				relative need for different uses.	<p>class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.</p> <p>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.</p>
Greenham Parish Council		No	Yes	<p>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.'</p> <p>What is meant by 'non town centre use'?</p> <p>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.</p>	<p>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.</p> <p>This approach to office developments within existing centres has been previously debated at the hearings into the Core Strategy.</p>
Further Examination Proposed Focused Change 21 (FEPFC 21)					

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Consultee	Agent	Soundness	Legal compliance	Consultee Comment	Council response
Policy CS14 Transport and Explanatory Text (Page 61)					
Greenham Parish Council		No	Yes	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Any future planning application for the site will have regard to access.</p>
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

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				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.