

APPENDIX C

Further Inspector Proposed Focused Change (FIPFC)

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

Consultee	Agent	Sound	Legal Compliance	Summary	Council Response
North Wessex Downs AONB		No	Yes	<p>We consider that the overarching housing objective for the AONB should be to meet identified local housing needs, not 'appropriate and sustainable growth that conserves and enhances its special landscape qualities'. 'Sustainable growth' is not the purpose of AONBs.</p> <p>The current wording of ADP Policy 5 neglects a range of issues on which neither the Council nor any other contributor has rebutted significant evidence submitted by ourselves.</p> <p>The proposed new wording of 'adhering to the landscape priority of the policy' is too vague and a matter of interpretation, and provides no reliable basis for adjudicating between proposals.</p> <p>We suggested that with affordable housing on exceptions sites and suitable development on brownfield sites the acceptable provision in the Plan could sum to 1,400 dwellings. The AONB housing figure should be reduced to a realistic 1400, with any additional housing being restricted to Hermitage and Compton brownfield sites</p>	<p>The housing provision for the AONB was discussed at the Hearing Session on 28th June 2011 and the Inspector's Note (2) – July 2011 which stated (para 3.23) that the Further Proposed Focused Change was required for soundness, was in response to those discussions.</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. 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</p>

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				and rural affordable exception sites.	<p>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> <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>The position with regard to completions and commitments within the AONB at March 2011 is</p>

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

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

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				<p>There should be more detail as to what constitutes "appropriate and sustainable growth that conserves and enhances its special landscape qualities."</p> <p>The policy only relates to development within the AONB, there maybe development outside the AONB which impacts on it.</p> <p>Rationale for adopting FEPFC9 over FIPFC1 appears reasonable and should give clearer protection to the AONB.</p>	<p>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> <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</p>

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					<p>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	Director Boyer Planning Ltd	No	Yes	Support the Inspector's proposed changes for the 1st point of ADPP5. The figure of up 2000 dwellings in the AONB is still considered too high. Housing development in the AONB should be small scale, infilling and should respond to the needs of the local community. It is considered inappropriate to allocate a specific number of dwellings to the area; instead there should be reallocation of housing numbers to the main urban areas.	<p>These issues were raised and discussed at the Hearing Session on 28th June 2011 and the Inspector's Note (2) – July 2011 which stated (para 3.23) that the Further Proposed Focused Change was required for soundness, was in response to those discussions.</p> <p>Given the objective of promoting sustainable communities in both urban and rural areas of the</p>

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