

**Appendix D**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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			<p>The CS should be revised to ensure encouragement of mixed housing/commercial development and housing requirements elsewhere should be reduced accordingly.</p>	
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	<p>Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to:</p> <ul style="list-style-type: none"> <li>- Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents;</li> <li>- Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need;</li> <li>- Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually constrained economic growth;</li> <li>- Recognise the relationship between housing and other forms of development- particularly employment;</li> <li>- Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional</li> </ul>	<p>The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF.</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 a review of other</p>

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

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			<p>the Site Allocations and Delivery DPD. However, there are no timescales for the adoption of this document. Therefore, the Local Authority's ability to ensure a sufficient supply of land during the plan period is flawed. It is recommended that a Contingency Policy should be included within the Core Strategy. Our recommended Contingency Policy is detailed in the representation to Policy CS1 –'Delivering New Homes and Retaining the Housing Stock' . The recommended Contingency Policy should be taken forward in order to ensure a continuous supply of housing during the plan period.</p>	
Newbury and Thatcham				
West Berkshire Liberal Democrat Shadow Executive		No	<p>In the context of NPPF19 and NPPF76, the high densities of residential development forming just part of several recent planned/approved/under construction sites in Newbury town centre, and the amount of under-used and semi-derelict employment land on the periphery of the town centre, a very significant contribution to Newbury's housing numbers could be made without taking up a strategic sized greenfield urban extension.</p> <p>ADPP2: Newbury Housing: after 'later in the plan period' replace 'to the south at Sandford' with 'through mixed-use residential-led regeneration of sites in a broad location on the eastern periphery of the town centre, mainly in the London Road Industrial Estate'.</p> <p>ADPP2: Newbury Town Centre third bullet point: after</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>No change to policy ADPP2. Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other than B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially</p>

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

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

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

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

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

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			<p>should be included within the list of Rural Service Centres in Area Delivery Plan Policy 1.</p>	<p>Allocations and Delivery DPD, in co-operation with Basingstoke and Deane BC and taking account of development plan policies in Basingstoke and Deane and of Policy CS9a.</p> <p>Paragraphs 2.31 and 2.31d of the Core Strategy Background and Challenges section, states that "A cross-border working group exists between West Berkshire Council, Hampshire County Council and Basingstoke and Deane Borough Council on areas of common concern..."</p>
<p>HDDL and the TA Saunders Trust</p>	<p>Pegasus Planning Group</p>	<p>No</p>	<p>Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to:</p> <ul style="list-style-type: none"> <li>- Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents;</li> <li>- Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need;</li> <li>- Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually</li> </ul>	<p>The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF.</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</p>

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			<p>constrained economic growth;</p> <ul style="list-style-type: none"> <li>- Recognise the relationship between housing and other forms of development- particularly employment;</li> <li>- Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional relationship with Reading; and</li> <li>- Comply with the objectives, principles and policies of the NPPF especially as it fails to promote a presumption in favour of development.</li> </ul>	<p>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.</p> <p>The detailed points raised by Pegasus Planning and the Council's response are set out in an Appendix H.</p>
<b>Delivering New Homes and Retaining the Housing Stock</b>				
Croudace Strategic Ltd	Boyer Planning Ltd	No	<p>In our view the CS does not go far enough to meet the requirement of the NPPF. We recommend that there is a planned over supply of sites, with a number of smaller sites brought forward at the beginning of the plan period to benefit the current market, meet local need and potentially reduce the number of applications which the Council has not planned for. The expectation of the NPPF is that every effort should be made to drive forward the potential housing development, and that if the numbers of dwellings from identified sites through this plan making process exceed 11,000, this should be encouraged.</p> <p>The timeframe for the validity of the plan should be extended to 2027 in order to maintain a strategy for the District for the next 15 years. In line with this, an additional years' supply of housing should be added onto the baseline housing target; increasing the figure</p>	<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 acknowledges that evidence of need and projections of population growth indicate that the planned housing provision may not meet all projected requirements. In light of the District's significant constraints, including historic and landscape character, AONB, floodplain, infrastructure provision and issues relating to proximity to AWE establishments, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable.</p>

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

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

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				<p>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>A higher level of housing was tested through the SA. The option of delivering above the RSS requirement was appraised as the least sustainable option.</p>
HDDL and the TA Saunders Trust	Pegasus Planning Group	No	<p>Representations relate to CS1 in general and paragraphs 5.1, 5.1a, 5.1b, 5.1c and 5.1e in particular</p> <p>Pegasus Planning Group considers that the Core Strategy does not meet the requirements of the draft NPPF. It fails to:</p> <ul style="list-style-type: none"> <li>- Use a proportionate, relevant and up-to-date evidence-base - the Berkshire HMA is out of date and analysis of the most recent indicators suggests that affordability within WB has declined significantly. Housing target based on out-of-date and incomplete evidence base cannot meet needs of current or future residents;</li> <li>- Objectively assess and meet the housing, business, and other development needs of the area - the Council should be planning for a higher level of market housing so that they can make a more significant contribution to meeting affordable need;</li> <li>- Support economic growth - the Council is planning for a significant deficit in its resident labour force, leading to unsustainable commuting patterns and eventually</li> </ul>	<p>The argument put forward by Pegasus Planning is for a substantial increase in the housing requirement based on the premise that the evidence base is outdated and that the housing target does not comply with the requirements of PPS3 or the draft NPPF.</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</p>

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			<p>constrained economic growth;</p> <ul style="list-style-type: none"> <li>- Recognise the relationship between housing and other forms of development- particularly employment;</li> <li>- Take account of West Berkshire's relationship with its neighbouring authorities - by ignoring its functional relationship with Reading; and</li> <li>- Comply with the objectives, principles and policies of the NPPF especially as it fails to promote a presumption in favour of development.</li> </ul>	<p>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.</p> <p>The detailed points raised by Pegasus Planning and the Council's response are set out in Appendix H.</p>
Mrs Karen Gillam		No	<p>The core strategy seems to imply commitment by WBC to develop previously developed land which is in accordance with the National Planning Policy. However, the council has considerably underestimated the number of houses that can be accommodated in Newbury, only allocating approximately 1000. By taking into account proper use of mixed use sites such as Parkway, Faraday Plaza (approved) and Market Street re-development as a 'broad location' for a 'strategic site' the approx. 5400 home quota for Newbury can be fulfilled with those homes already built or committed. This would avoid the need to build on Sandleford Park, a greenfield site, disrupting the habitat of ancient woodland and causing gridlock in south Newbury with potentially a further 3,000 cars in an area which is already congest considerably during peak periods and unable to sustain development. Policy CS4 should be deleted.</p>	<p>No change required. The Strategic Housing Land Availability Assessment (SHLAA) has examined the potential for housing on both previously developed and greenfield sites. Throughout the preparation of the Core Strategy there has been recognition that, though most development will be on brownfield land, some development will need to take place on greenfield land, particularly to meet the need for delivering a mix of housing types, including family homes.</p> <p>The mixed use sites at Parkway and Faraday Plaza are already included within the five year housing supply and the Market Street area has an adopted SPD for mixed residential led development. Appendix B to the Core Strategy shows that the requirement can not be met from homes already built or committed.</p>
Gladman Developments		Not specified	<p>Meeting the housing needs of West Berkshire through an informed housing target is fundamental to securing</p>	<p>This housing figure has been debated at the hearings into the Core Strategy. The housing requirement of 10,500 homes,</p>

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Ltd			<p>growth in accordance with the NPPF.</p> <p>Policy CS1 is not considered to be sound as there is not a strong evidence base and therefore robust justification for the housing target promoted for the District.</p> <p>Policy CS1 must include for past under delivery alongside the objective assessment of future needs in order to determine the full requirements for market and affordable housing.</p> <p>Housing targets should be treated as a minimum.</p> <p>The Local Authority needs to positively manage growth and grant more planning permissions in order to meet housing need.</p> <p>If the Local Authority identify through annual monitoring that there is a shortfall, additional land would have to be identified to prevent the housing strategy being compromised.</p> <p>A Contingency Policy should be included within the Core Strategy in order to provide for and manage the delivery of housing during the plan period.</p> <p>The Core Strategy should be realistic about the proportion of brownfield development to be delivered during the plan period.</p> <p>Brownfield sites should not be released at all costs. Therefore, a brownfield first approach can only be</p>	<p>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>In light of the District's significant constraints, including historic and landscape character, AONB, and floodplain, the Council considers the 10,500 figure to be the most appropriate. Past delivery rates suggest that this level is achievable.</p> <p>The requirement for 10,500 homes was always seen as the minimum requirement rather than as a ceiling. Planning for long term housing provision can not be exact but the Council does not feel it is appropriate to specify a ceiling.</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>

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

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

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

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

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

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

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

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				<p>homes.</p> <p>Residential developments need to be balanced with the provision of employment. Policy CS10 does allow for employment generating uses other than B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.</p>
<b>Housing Type and Mix</b>				
Gladman Developments Ltd		Not specified	<p>We support the Local Authority's approach to determining the appropriate housing mix for individual sites that comes forward. The proposed approach endorses the NPPF aspirations for an evidenced based approach to plan making and the principal of delivering sustainable development. As stated by Policy CS5 the mix for individual sites should have regard to:</p> <ul style="list-style-type: none"> <li>- The character of the surrounding area;</li> <li>- The accessibility of the location and availability of existing and proposed local services, facilities and infrastructure;</li> <li>- The evidence of housing need from Housing Market Assessments and other relevant evidence sources.</li> </ul>	<p>The sections of the representation regarding housing mix and consultation on Local Plan are noted. No change required.</p> <p>Issues regarding density and viability are addressed in the SHMA and the SHLAA, which is regularly updated. Both are prepared in consultation with the development industry.</p> <p>The policy is intended to be flexible in relation to density but with the principle that developments make efficient use of land, taking into consideration character of the area and its surroundings and public transport provision.</p>

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

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

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

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Employment and the Economy				
Miss Airlie Dyson		No	<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.</p> <p>The wording on page 14 of the FEPFC19 is not consistent with the draft NPPF: "In making allocation for residential development...any proposed location will be considered".</p> <p>Page 5 para 19 – planning policies and decision should make effective use of land, promote mixed use developments ....enable reuse of existing resources, such as through conversion of existing buildings’.</p> <p>Page 19 para 75 – planning policies should avoid the long term protection of employment land or floorspace’.</p> <p>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’.</p> <p>I think the Council should stop protecting employment land and floorspace and promote these areas for mixed residential and employments as directed by the NPPF. This will reduce the need for large strategic sites on land at present reserved for nature.</p>	<p>No change required.</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 recognise the importance of residential developments in maintaining the vitality of centres, but it is also recognised that such developments need to be balanced with the provision of employment. Policy CS10 does allow for non town centre uses, such as residential, which involve the loss of office floorspace within existing centres, provided it can be demonstrated that such schemes would maintain the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy plan period in that centre.</p> <p>The Council recognise the importance of residential developments in maintaining vibrant places, but it is also recognised that such developments need to be balanced with</p>

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				the provision of employment.
Vodafone Ltd	Colliers International	No	<p>Policy CS10 is indeterminate in terms of the Vodafone site. The draft NPPF states that policies should be based upon a presumption in favour of sustainable development and how the presumption will be applied locally. Furthermore, plans should set out clear guidance on what will/will not be permitted and where. Policy CS10 is indeterminate in terms of development at the Vodafone Headquarters site in that no clear vision is provided for the site. Specific mention should be made in the policy regarding the Vodafone site alternatively there should be a bespoke policy for the site.</p> <p>This fails the test in the draft NPPF that policies must be positively prepared.</p> <p>CS10 does not appropriately consider the change in emphasis in national policy on the location of office development, or the relaxation on the protection of employment land or floorspace, which is expressed in the draft NPPF.</p> <p>Policy CS10 and the explanatory text should be appropriately amended to reflect the NPPF which seeks:</p> <ul style="list-style-type: none"> <li>-To acknowledge that office development is in general appropriate in other locations providing it is consistent with the NPPF criteria;</li> <li>-Remove the sequential approach to offices;</li> <li>-To ensure that planning polices avoid the long term</li> </ul>	<p>No change required. Policy CS10 clearly states that business development will be supported on existing employment sites, particularly sites such as Vodafone. Such sites will be assessed further through the Site Allocations and Delivery DPD to determine whether they should be designated as a Protected Employment Area or an alternative bespoke designation. The policy clearly sets out the Council's intentions for the Vodafone site and other similar employment sites within West Berkshire.</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 than B class uses within Protected Employment Areas where they are complimentary to existing business uses in that location and consistent with the integrity and function of the location for employment purposes. Non B class employment generating uses will not be permitted which are likely to substantially prejudice the strategy set out within the policy.</p>

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

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

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

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