

Appendices E - H

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

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

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

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

- (i) Sandleford How it Went Wrong in 2009 (page 4 – 7)
Officer response (page 8 – 13)
- (ii) Appendix 8 - Re-assessment of Newbury Options in SA (page 14 – 17)
Officer response (page 18 – 21)
- (iii) Newbury's New Housing If not Sandleford Park, then where? (page 22 – 23)
Officer response (24 – 25)

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

- Officer response (page 28 - 64)
- (i) SNTS appraisal of Strategic Sites SA/SEA (page 29)
Officer overall summary response (page 29 – 30)
SNTS Tabular Appraisal (SA Key Issues) (page 31 – 44)
Officer response to Tabular Appraisal (page 45 – 50)
SNTS Tabular response to Core Strategy (page 51 – 53)
Officer response to Tabular response to Core Strategy (page 54 – 56)
- (ii) SNTS representation on soundness (page 57)
Officer response (page 57)

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

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

Officer response (page 65 – 68)

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

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

Officer response (page 70 – 79)

Appendix E

Representation by West Berkshire Liberal Democrat Shadow Executive

(i) Sandford: How it Went Wrong in 2009

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

Reproduced in full (page 4 – 7)

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

(page 8 – 13)

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

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

Reproduced in full (page 14 – 17)

Officer proposed Council response to the above document providing corrections and amplifications as it is considered that the document is both confusing and misleading.

(page 18 – 21)

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

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

Reproduced in full (page 22 – 23)

Officer proposed Council response to the above document providing corrections and amplifications as it is considered that the document misleading.

(page 24 – 25)

Sandleford: How it Went Wrong in 2009

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

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

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

Narrative

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

All members of PTG (except Cllr Tony Vickers¹) were present at the meeting. The officer who introduced the report (agenda item 4) on the emerging SA, in which the use of "*topic papers*" was explained, was asked for – and gave – a list of the papers, that did include strategic sites. Although "*members agreed with the methodology of the topic papers*" they asked "*to see a*

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

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

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

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

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

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

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

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

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

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

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

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

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

At the **25 Sep 09 PTG**, which neither Lib Dem Members were able to attend⁴, the Council’s “Response to Comments on Options for the Future” was presented. It proposed (p.41) “*that an additional strategic allocation at Sandleford is included within the CS*”, for 2000 homes, of which 1500 would be in the Plan Period. The minutes record that “*Members were supportive*” of this but the agenda report did not suggest any decision or recommendation to Executive would be made. Despite this, members of the ruling Party have been told – and it has been publicly announced - that “*a unanimous decision was made to select Sandleford*” at this meeting.

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

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

Council Response to:

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

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

Comments on Paragraphs 1 – 3

The opening paragraph in bold states that the scoring system was changed however this is not the case, the scoring system has not been changed.

In the second paragraph:

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

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

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

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

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

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

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

Comments on the Narrative

Paragraph 4:

The Site Selection Framework and its scoring system remain part of the SA/SEA.

Paragraphs 5 - 7:

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

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

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

Paragraphs 8 and 9:

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

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

Paragraph 10:

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

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

Paragraph 11:

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

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

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

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

Paragraphs 12 and 13:

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

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

Paragraphs 14 - 16:

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

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

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

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

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

Paragraph 17

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

Paragraph 18:

No comment

Paragraph 19:

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

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

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

Comments on Conclusion

Paragraphs 20 - 22:

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

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

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

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

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

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

PAGE 14

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

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

Introduction.

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

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

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

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

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

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

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

Council Response to:

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

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

Text under introduction:

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

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

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

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

Reassessment tables:

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

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

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

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

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

The column titled "score" lists scores highlighted in yellow with no explanation as to where these scores have come from or how they have been reached, are they new scores using the site selection framework (for the sites on their own or somehow in combination with the Racecourse) or are they a new SA score from Appendix 8?

Taking sub-objective 3b as an example:

The site selection framework scores sites using a map of open space, where a site scores ++ if it is within 400m of an area of open space or will provide new open space, -- if the site will result in the loss of open space or countryside used for access and recreation. With a ranking of 'Medium' this means the only possible scores are -4 or 4. For Sandleford in the site selection framework the Council scored it -4 (loss of countryside used for access and recreation). In the 'Amended Appendix 8' the score is given as +1. There is no explanation as to how this score relates to the scoring mechanism of the site selection framework. The main SA does not provide numerical scores only ++, +, 0, -, --, +/- and supported with a comment.

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

Specific SA sub-objectives:

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

Sub-objective from 'Amended Appendix 8' attachment	Council Response
No 3a: <ul style="list-style-type: none"> • States that despite the Council raising 'capacity issues' for education, Sandleford receives a 	<ul style="list-style-type: none"> • Detailed explanation from the Council's Education service indicating a 'very strong preference for the Sandleford

<p>positive score.</p> <ul style="list-style-type: none"> • States that for North Newbury there is 'clearly scope for extending all nearby schools' • Misquotes Head of Housing as saying at PTG (17/10/11) that regarding concerns over connectivity at North Newbury 'site naturally divides into phases and that one large site is less favourable to creation of integrated community. Does not include quote from same meeting of Head of Planning which gives further explanation and clarity regarding this issue. Further explanation was also given by the Chairman of PTG. 	<p>site' is set out within Council's SA Appendix 8.</p> <ul style="list-style-type: none"> • Education Service has commented that they would not support the North Newbury site (Core Document CD09/46). This was discussed at Planning Task Group on 17/10/11 (see presentation and also page 3 of the minutes). • Correct quote from Head of Housing is "2,000 homes in one estate was usually considered to generate housing management issues that were not desirable" Head of Planning explained (page 6 PTG minutes 17/10/11) that "for education a split site involved problems of access for children across a main road. There were also problems associated with the best location for shops and facilities with a split site."
<p>3b: Correctly quotes from the re-assessment that 'development of site could improve access to adjacent countryside' and then criticises this due to the need to cross a main road to get to the countryside.</p>	<p>It is correct that to access existing countryside there would be a need to cross a major road. However, this ignores the proposal to create a Country Park or area of public open space on the site itself to take pressure of Greenham Common. This is set out within the Council's SA Appendix 8, formed part of the presentation to PTG and is minuted in the PTG minutes (17/10/11).</p>
<p>4c: North Newbury is recognised by the Council as being closer to town centre than Sandleford (exc for station)</p>	<p>Walking distance to Parkway from Sandleford is 200 metres further than from North Newbury, however to the Northcroft Street Bridge is 300 nearer from the Sandleford site. The Sandleford site is 800m closer to Newbury Railway Station.</p>
<p>6c: There is certainly no impact on Donnington Castle or village. It can be seen from neither.</p>	<p>The indicative Masterplan prepared for North Newbury and emailed to Cllr Vickers on 27/10/2011 shows residential development right up to the edge of Donnington village, which would have least impact in landscape terms but would have an impact on the settlement form, pattern and character. Though development would not be visible from the Castle or the older part of the village, any development would need to be careful not to compromise the setting of these. The concern is that the</p>

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

Newbury's New Housing

If not Sandlesford Park, then where?

Of the 10,500 (min.) new homes that West Berkshire needs to provide between 2006 and 2026 (the so-called Plan Period), Newbury¹ has to take approx. 5,400. **That is 'a given' – not for consultation now.**

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

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

Before the SADPD is drafted, a review of the Employment Land requirement will be carried out². This is significant, because almost all remaining sites in Newbury with potential for taking more than about 5 new homes each are currently designated for ‘employment uses’. [There are few ‘garden grabbing’ sites left!] The Council has to prove that there is more than enough land for offices, factories, warehouses etc in Newbury, before it can release such land purely for housing.



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

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

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

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

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

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

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

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

Most of these sites are owned by the District Council. Many of them are in the flood-plain – but only another £110,000 is needed to ensure that a flood prevention scheme, already designed by the Environment Agency, can start next April and be finished within a year. We say the Council should put up this money, because it stands to gain millions of pounds in future rent and rates³ revenue by protecting its properties from flooding.



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

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



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

Dr Tony Vickers MRICS
for ***Sandleford: the Wrong Solution***
(November 2011)

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

Council Response to:

Newbury's New Housing: If not Sandleford Park, then where?

(November 2011)

(Attachment to representation by West Berkshire Liberal Democrat Shadow Executive on FEPFC 19)

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

- At this point nothing is “a given”. The Core Strategy has been re-published for consultation along with a revised SA/SEA. There are no policy areas which are “not for consultation now” as stated in this attached document. The Council is asking for comments on the Core Strategy in the light of the revised SA/SEA and consultees are free to comment on any policy in the document.
- It is not true that almost all remaining sites in Newbury with potential for taking more than about 5 new houses are currently designated for employment uses. The Strategic Housing Land Availability Study (SHLAA) has identified a significant number of sites within Newbury that are potentially developable that are not protected employment areas. There is also no evidence put forward that “there are few garden grabbing sites left”. The Council are not including garden sites in their estimates of land availability but these are anticipated to come forward for development in the same manner as they have previously.
- The Council has considered the potential for mixed use development. The Spatial Strategy (Policy ADPP1) states that West Berkshire’s urban areas will be the focus for most development. The most intensively used developments, intensive employment generating uses, such as offices and intensive trip generating uses, such as major mixed uses, retail or leisure uses, will be located in those town centre areas where the extent and capacity of supporting infrastructure, services and facilities is the greatest.. The policy for Newbury (ADPP2) includes the regeneration of the Faraday Road area for mixed use and office development, as well as the development of the Market Street area as a mixed but predominantly residential area.
- A site does not have to be capable of taking at least 500 new homes to be strategic. If smaller sites had been central to the delivery of the strategy they could have been identified as strategic sites.
- The concept of a strategic broad location covering “Newbury’s Town Centre Periphery” is not considered to be an effective mechanism for demonstrating the deliverability of the Core Strategy, as policies are already in place to facilitate housing development in this area, both in the Local Plan and the proposed Core Strategy. The broad location proposed for the East is different in that it identifies the direction of development beyond existing settlement boundaries.
- No evidence is provided that 500 more dwellings can be developed within the existing settlement boundary than the Council has taken account of. The Council’s SHLAA has sought to identify all potential sites and no additional

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

- It is not appropriate for part of the allocation for Newbury to be developed in Compton. Any development at Compton would be included in the housing figures for the AONB. The Inspector has been particularly concerned that housing numbers proposed for the AONB should not be exceeded.
- The SA/SEA, both at publication in February 2010 and in the revised version published in November 2011, does not show Sandleford as the least sustainable potential urban extension. The Strategic Sites Policy Paper has been extensively revised to take on board further information regarding the potential site layout and consultation responses received. The comparison between the sites in tabular form is an appendix to this document (Strategic Sites Policy Paper), but is not “buried away”. The document is available from the Council’s webpage www.westberks.gov.uk/index.aspx?articleid=24036. Contrary to what is said in this attached document, consultees **are** being asked to comment on this if they feel it has implications for the soundness or otherwise of the Core Strategy policy. The SA and the Core Strategy are developed together and comments can only properly be made in relation to the Core Strategy: the SA is, in effect, part of the evidence on which the policies are based.
- The numerical scoring in Cllr Vickers’ re-working of the SA Table is hard to understand and illogical. There is no explanation of the change in scoring from the original Site Selection Framework and this table seems designed to confuse. The Council will respond to this as a separate Appendix.

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Appendix F

Representation by Say No to Sandleford (SNTS)

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

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

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

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

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

Officer overall summary response (page 29 – 30)

SNTS Tabular Appraisal (SA key issues) (page 31 – 44)

Officer response to Tabular Appraisal (page 45 – 50)

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

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

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

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

Reproduced in full (page 57)

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

Council Response to:

Attachments to representation by:

Say No to Sandelford campaign (SNTS)

in relation to policy CS4 in light of the changes to the SA/SEA.

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

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

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

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

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

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

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

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

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

Reasons for compliance and soundness

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

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

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

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

Council Response

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Para	Statement	Response
10.7	<u>Sandleford: A very strong preference. No capacity at the primary school so a new primary school would be required. Secondary provision would be the easiest to manage here out of the 3 reserve sites. the school could be expanded to a decent enough size to deal with the impact of the development.</u>	What assumptions have been made about student numbers and has the Council taken into consideration that Park House is now an academy and therefore may have their own views on the ideal size for their school? Failure of Park House to expand sufficiently could be a major risk outside of the Council's control.
10.8	<u>Additional concerns were raised regarding the potential for development of the North Newbury site to cause flooding issues. In particular a response on behalf of Vodafone refers to an extreme flooding event in July 2007 which resulted in the Vodafone campus being flooded at a resultant cost of £12 million</u>	The flood risk of North Newbury site was already known at the outset so why was it included in the shortlist if this was to weigh as a major factor against the site?
11.1-1 1.7	<u>Approach to Thatcham</u>	There is a lack of logic in the Council's approach when looking at Sandleford versus Thatcham. The argument for a large strategic site is that there is leverage with the developers to extract large infrastructure improvements and to deliver other community amenities and to be able to better control the delivery of housing. These benefits are equally applicable to Thatcham which has more to gain from developer contributions than would be the case for Sandleford where it is acknowledge that: "the town centre is in need of regeneration and there are capacity issues with the schools. The capacity of the schools in Thatcham was a particular issue identified through consultation with the Council's education department". Elimination of Thatcham and with it large scale developer money for improvements does not seem logical.
11.15	<u>This assessment, although not conclusive on which site was the more sustainable with the Newbury Racecourse site, clearly showed that Sandleford did not score more poorly than North Newbury or Siege Cross</u>	The sites in Appendix 4 come out evenly under the criteria judged, however when viewed with the earlier assessment where North Newbury scored 0, Siege Cross -2 and Sandleford -16 should have been an indication that something was amiss with a large development on this site. The rationale again lacks explanation.
11.15	<u>The officer recommendation remained to allocate Sandleford</u>	In spite of the evidence stating otherwise and Council asking to broaden the consultation the decision had already been taken.
11.15	<u>The North Newbury site, by comparison, is more remote from local facilities and is bisected by the A339</u>	Again this should not have been a surprise fact and therefore if it was to be a major consideration why was it selected to run against Sandleford when other more appropriate sites had been identified?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Council Response to detailed comments in SNTS Core Strategy Response

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

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

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

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

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

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

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

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

Council Response

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

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

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

Consultee responses forwarded by the Say No to Sandlesford Group

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

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

	<p>of its location; overlooking greenfield land</p> <p>Sandleford is THE WRONG SOLUTION</p>
Maggie Heath	<p>Completely agree that this is the wrong place for this development. It will create mammoth traffic problems south of Newbury, with the A339 already being one of the busiest roads in the area.</p>
Meg Thomas	<p>The website is too complicated. You need a petition saying NO (like Avaaz use)</p> <p>This would take people two minutes and you would get masses of signatures</p> <p>We're not all a) intellectual b) time rich.</p>
Mick Brown	<p>It occurs to me that if this were to go ahead, Newbury just doesn't have the infrastructure to cope with the additional traffic. It will place more cars on Monks lane, a busy road and used by many school children, it will also increase traffic getting into town. It only takes one minor problem to cause major delays, such as this morning, 6th December, in the St Johns area. With the addition of the racecourse development and the lack of new roads to cope with that is just asking for major traffic problems. I also wonder how services can cope with the additional demand on water for instance. How do the schools cope as well with the additional need for places? Its too much, on what should be treated as green belt.</p>
Monique Nash-Williams	<p>I am completely against this development:</p> <ul style="list-style-type: none"> -The infrastructure is not there: schools, surgery, and roads could not cope and the traffic is already bad (thousands extra cars would bring it to a standstill). - It would be a dreadful misuse of agricultural land (which will never be regained once it is concreted over; with the projected increase in population, we can't afford to do that when there are other solutions). - It would destroy some ancient woodland and its wildlife, which will be irreplaceable. - It is much too big a project to be built in one place; smaller developments should be dotted around the town and villages through West Berkshire, also using brownfield sites, empty offices, etc. - It is only a "strategic site" to the people who do NOT live in Newbury. Things affecting Newbury, such as the Sandleford development, should be decided by people who actually live in Newbury, for the good of Newbury, and NOT by people who live at the other end of the county and do not really care about our town.
Michael Gray	<p>I feel the proposed plan will add additional traffic to an already very congested area. You only have to see the congestion at Monks Lane/A34 at 8.30 in the morning at the moment!</p>

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

	<p>My objections to the development are manifold:</p> <p>The location is a prime Greenfield site</p> <p>There are better suited Brownfield sites that are more sustainable in our area</p> <p>With a potential 2,000 households (not the 1,000 Mr. Goff asserts) in the area there will be inadequate provision for education with the children of new residents added to the catchment of existing schools</p> <p>Social provision is already stretched. As an example, as the membership secretary for the Wash Common Scout Group, I'm acutely aware that the waiting list to join our Group includes 73 children, many of whom we will have to disappoint, a situation that will worsen with high numbers of new residents</p> <p>It is unclear why the Sandleford development should have leap-frogged to 2nd place over other more suitable development sites in a sustainability study that had initially seen it ranked 11th of 11.</p> <p>There is no provision for additional healthcare to support a further 2,000 households</p> <p>The employment opportunities cited are with companies that currently enjoy largely full employment such as Tesco, businesses at the retail park and the local car showrooms</p> <p>The only means of access to and from the site for the private vehicles of 2,000 households will be two points on Monks Lane, which already suffers significant congestion and the proposed improvements to ease the anticipated congestion are unrealistic</p> <p>The valid element of Mr Goff's letter is that he has raised the issue to a broader Newbury audience and his citing of the wider issues; including affordable housing, infrastructure delivery plans, economic development and conservation areas are great reminders of why the Sandleford development should not progress. I am disappointed that my letter will not be published before the date of the meeting, to aid in further informing the debate.</p> <p>I am sure that many people within the community would want to know why one of our finer Greenfield locations has been chosen ahead of other far more sustainable locations and be able to challenge the evaluation process to ensure that it is safeguarding the interests of all Newbury and West Berkshire residents.</p> <p>The cynic within me questions whether the potential 100 fold increase in land valuation that the current owner will enjoy if able to sell the site as a development parcel has anything to do with it. I would encourage a resourceful journalist at the NWN to investigate whether undue influence has been applied to those entrusted with making the decision.</p>
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<p>Judy Winnett</p>	<p>I am writing with regard to the consultation that is currently taking place regarding the WBC Core Strategy.</p> <p>Unfortunately it appears that the council are making it extremely difficult for members of the public to air their views on this subject in an easy forthright manner.</p> <p>The current process is extremely intimidating, confusing and very time consuming. Even though I am computer literate and would like my opinion to be heard I am finding this process almost impossible to follow.</p> <p>With the potential of such large ramifications, surely it is important to ensure that the consultative process is democratic and available to everyone which includes ensuring the process is available to everyone.</p> <p>My understanding is that all comments need to be submitted by Friday. Unless there are alternative ways for comments to be submitted then I feel this deadline should be moved until the New Year and a more friendly, democratic submission process be made available to all members of the public.</p>
<p>Angela Money</p>	<p>I have just sent the below e-mail to: consultations@newbury.gov.uk</p> <p>Unfortunately, I have not got the time before the deadline to fill in all the forms etc., but I am quite happy for you to forward my comments to anyone else that you feel they should go to. Cllr Howard Bairstow will receive the other e-mail that I have sent to my neighbours.</p> <p>From my other e-mail address I have sent an e-mail to you saying that I could not see where to vote on the Newbury Weekly News website.</p> <p>Very many thanks for all that you have done.</p> <p>Best wishes</p> <p>Angela Money</p> <p>I wish to advise that both my husband and I are opposed to the building of 2000 houses on Sanddeford. I cannot understand why</p>

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

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

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

The representation is summarised (page 60)

Detailed officer proposed Council response (page 60 – 62)

Council Response to:

Attachment to representation by:

Consultee: The Fairhurst Estate and BGL Reads Trust Company Limited as Trustee of the JSF Accumulation and Maintenance Settlement.

Agent: Gerald Eve

in relation to policy CS4 in light of the changes to the SA/SEA.

Summary of comment:

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

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

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

Officers' Recommendation:

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

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

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

Taking the headings in the representation in turn:

Schools

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

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

Connectivity

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

Local facilities

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

Vodafone is a local employer and is included in the Council's assessment.

Highways

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

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

Sustainable Transport

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

Impact on built environment

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

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

Flood risk

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

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

Landscape

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

Open Countryside

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

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

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

Appendix H

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

Detailed representation

The representation is summarised (page 64 – 73)

Detailed officer proposed Council response (page 64 - 73)

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

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

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

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

	2012, it will only plan for housing over a remaining period of 14 years.	
3	<p>Comments on Consultation 1</p> <p>As demonstrated by our response to the previous consultation (June 2011), exceeding the number of dwellings allocated by the South East Plan will not result in West Berkshire's Core Strategy being out of conformity with the South East Plan. Regardless, the Government has made its intentions to revoke the South East Plan very clear, supported by the recent Localism Act 2011. Pegasus Planning therefore considers that the requirement to conform to the South East Plan has little consequence in practice. Constraining housing numbers to the South East Plan numbers is therefore nonsensical when evidence of housing need within West Berkshire far exceeds even the 11,000 dwellings that could be accommodated with no adverse environmental effect.</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 critical elements of the evidence base.</p>
3.4	<p>The SA/SEA does not make clear what level of housing above the RSS target was assessed against the Councils SA objectives for option 3. Without testing specific alternative numbers of housing delivery above the South East Plan, West Berkshire are not able to take a view on all reasonable alternatives. As a very minimum we suggest that the Council should test the level of dwellings that its SHLAA identified can be provided (16,202 dwellings) against the SA Objectives.</p>	<p>The SA (Delivering New Homes and Retaining the Housing Stock SA Policy Paper) looked at having no policy and options for allocating less or more than the RSS requirement. Under-allocating would be contrary to government guidance so the three options considered were no policy; the delivery of 11,000 homes (10,500 from the RSS and 500 shortfall from the period 2001-2006); and the delivery of above the RSS requirement (the RSS encourages LPAs to test higher levels of provision). The latter was the least sustainable option so further investigation into the level of housing above the RSS figure was not necessary. The Council considers these to be reasonable alternatives to test.</p> <p>The Inspector has set out in his note why the submitted SA Report failed to meet the Regulations and he allowed the Council the</p>

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

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

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

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

<p>Through its adopted Core Strategy (2007), Reading Borough Council has committed to providing 10,930 dwellings between 2006 and 2026. However, the Inspectors report recognises that this is an ambitious figure in the context of Reading's tight boundaries, and limited suitable land for development, making it dependent upon brownfield land and windfall sites. The dependence of Reading upon its wider sub-region for the provision of an adequate labour force is therefore expected to increase.</p> <p>The Panel Report for the Draft South East Plan considered that a major development of some 7,500 houses could be accommodated in West Berkshire, north of the M4 and south west of Reading, without causing damage to environmental assets or causing unviable infrastructure constraints.</p> <p>The Secretary of State rejected the Panel's recommendation to allocate an additional 7,500 houses to West Berkshire. However, this was linked to potential problems with the identified site, rather than the overall level of housing proposed for West Berkshire.</p> <p>The Secretary of State therefore welcomed a review of any additional evidence on the sustainability, developability and deliverability of significantly additional growth in the Greater Reading Area. Given that an early review of the South East Plan will no longer provide the opportunity to properly consider how the needs of the Greater Reading can be met within West Berkshire, Pegasus Planning Group consider that this matter must be addressed in detail by the West Berkshire Core Strategy examination.</p> <p>The Duty to Co-operate within the Localism Act 2011 means that it is now a statutory requirement for West Berkshire to consider the impacts of its Core Strategy policy upon its neighbouring authorities.</p> <p>By ignoring West Berkshire's functional relationship with Reading and the reliance of Reading upon its neighbours to meet its shortfall in housing delivery and labour supply, the West Berkshire Core Strategy represents an unsound approach to the 'duty to co-operate'.</p>	<p>Housing Market Area.</p> <p>The proposal for a major development of 7,500 homes was not a proposal in the Draft South East Plan, nor as Pegasus point out was it supported by the Secretary of State. The site lies in the floodplain south of Reading and is no longer considered a viable site for major development.</p> <p>The Council has consistently pointed out the constraints in the Eastern Area, with AONB adjacent to Reading on the west and floodplain to the south. But it has not ignored the functional relationship with Reading. The Core Strategy contains numerous references to this relationship and the Council will continue to work with Reading BC in any review of planning policies for the sub-region.</p>
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5.36 to 5.42	<p>Pegasus Planning Group considers that West Berkshire's Core Strategy is incompatible with the objectives, principles and policies of the draft NPPF. Not least, because the document fails to promote a presumption in favour of development.</p> <p>By restricting housing delivery to well below evidenced market and affordable need, the West Berkshire Core Strategy is failing to meet the needs of its current and future population, and is in turn restricting the areas potential economic growth, to below even that required to deliver adequate facilities and services to meet the needs of its local communities. The West Berkshire Core Strategy therefore plans for unsustainable development.</p> <p>The draft NPPF recognises that there is "no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly". This principle is not supported by West Berkshire's SA/SEA and Core Strategy, which limit growth in the rural areas without exploring all reasonable alternatives.</p> <p>Policy within the NPPF states that LPAs should prepare Local Plans with "sufficient flexibility to respond to rapid shifts in demand or other economic changes". In order to ensure a flexible provision of housing land supply, authorities should identify an additional 20 per cent of housing land upon their five year land supply identified in the SHLAA. By planning for lower than historic population and household growth (see Appendix 4), the West Berkshire Core Strategy provides no flexibility for housing delivery. Furthermore, the West Berkshire SHLAA only demonstrates 5.3 years worth of supply against its low target of 10,500 dwellings and just 4.5 years supply against the same target inclusive of the 20 per cent contingency. Against the level of need demonstrated by the 2008-based household projections, West Berkshires SHLAA demonstrates just 3.6 years without a 20% contingency (see Appendix 6).</p> <p>West Berkshire's Core Strategy is already out-of-date and is not consistent</p>	<p>The issues with regard to the housing requirement are answered above and the spatial distribution has been discussed at the hearings in June 2011.</p> <p>The Five Year housing land supply has been tested at appeal on three occasions within the last year and has been found to have demonstrated the requirement. The updated supply will shortly be published as an annex to the 2011 Annual Monitoring Report. If the NPPF, when finally published, retains the requirement to include an additional 20% allowance the 5 year supply will be updated to reflect the new requirement.</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 http://www.westberks.gov.uk/index.aspx?articleid=22820</p>

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