

Any representor may submit a written statement or statements answering the questions set out in Annex 2. However, these should only be in response to questions that relate to their original representations. Written statements must be received by the Programme Officer by the following deadlines:

Midday on Friday 16 February 2024 – statements for matters 1 to 3.

Midday on Friday 22 March 2024 – statements for matters 4 to 13.

By 16/02/24

M1 & M2 not responded to

M1. Legal and procedural requirements and other general matters

1.1 The duty to cooperate

Q1.1 Is there any substantive evidence to indicate that the Council failed to comply with the duty to cooperate during the preparation of the Plan up until the date on which it was submitted for examination?

1.2 Public consultation

Q1.2 Is there any substantive evidence that indicates that the public consultation carried out during the preparation of the Plan failed to accord with the Council's statement of community involvement?

1.3 Equalities

Q1.3 Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

1.4 Sustainability appraisal

Q1.4 Is there any substantive evidence to indicate that the sustainability appraisal fails to meet relevant legal requirements?

1.5 Habitat regulations assessment

Q1.5 Is there any substantive evidence to indicate that the habitat regulations assessment fails to meet relevant legal requirements?

1.6 Climate change

1.7 Flood risk

Q1.6 Is there any substantive evidence to indicate that the Council failed to apply the sequential test and then, if necessary, the exception test relating to flood risk during the preparation of the Plan as required by national planning policy?

1.8 Strategic policies and neighbourhood plans (Appendix 6)

Strategic policies

Q1.7 Do each of the policies SP1 to SP24 meet the criteria for strategic policies set out in national policy and guidance?

Q1.8 Do policies SP13, SP14, SP15 and SP21 contain unnecessary duplication and create ambiguity such that they are not sound? If so, would their replacement with the additional tables and text in chapter 8 as proposed by the Council represent a sound approach?

Neighbourhood plans

Q1.9 Is Appendix 6 consistent with relevant legislation and national policy? If not, would the deletion of Appendix 6 ensure that the Plan is legally compliant and sound in that respect?

1.9 Superseded policies in the adopted development plan (Appendix 7)

Q1.10. Is the modification to Appendix 7 relating to allocations not being carried forward necessary to make the Plan legally compliant and, if so, would it be effective in that regard?

1.10 References to supplementary planning documents and other guidance

Q1.11 Is it appropriate for Plan policies to refer to supplementary planning documents and other guidance documents that do not form part of the statutory development plan? If so, is the way in which such policies are expressed in the Plan unambiguous and justified in terms of the weight they expect decision makers to give to such documents?

1.11 Definitions (Appendix 9)

Q1.12 Are all of the definitions in Appendix 9 of the Plan consistent with those in NPPF Annex 2 or otherwise justified?

1.12 Viability

Q1.13 Does the viability evidence make reasonable assumptions about:

- (a) the cost of meeting all of the policy requirements included in the Plan along with any other relevant national standards;
- (b) the value of development; and
- (c) the price a willing landowner would be likely to sell their land for?

Q1.14 Does the viability evidence indicate that the total cumulative cost of all relevant policies will not undermine the viability of the development that the Plan assumes will take place during the plan period?

1.13 Strategic and local road networks

Q1.15 Is the Plan based on proportionate and adequate evidence about the impacts that the development proposed will have on the strategic and local road networks?

Q1.16 Is there substantive evidence to indicate that the development proposed in the Plan, in combination with other committed and planned development, would have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would be severe? In particular:

- (a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?
- (b) Does the Plan contain effective policies to secure the necessary mitigations?

M2. Amount of development needed in the District

2.1 Plan period

Q2.1 Is the Council's proposal to modify the Plan so that relevant policies look ahead to 2041 necessary to make the Plan sound?

2.2 Housing requirement (policy SP12)

Q2.2

- (a) Is the inclusion in the Plan of a minimum housing requirement figure of 513 net additional dwellings per year sound?
- (b) Or should the minimum housing requirement figure be increased above local housing need to reflect Reading's unmet need and/or to help deliver more affordable homes?
- (c) If so what should the total minimum requirement figure be?
- (d) Does the wording of policy SP12 need to be modified to clarify what the minimum housing requirement is (irrespective of what the figure should be)?
- (e) Does inclusion of a "target figure" (above the minimum requirement) provide a clear and unambiguous approach?
- (f) If so, is the "target figure" of 538 dwellings per year justified?

2.3 Office floorspace requirement

Q2.3

- (a) Is the identified need for a net increase in office floorspace of 50,816 sqm to 2039 justified?
- (b) If the Plan were to be modified to look ahead to 2041, how would the office floorspace requirement figure need to be modified?

2.4 Industrial and warehouse floorspace requirements

Q2.4

- (a) Is a minimum requirement of 91,109 sqm of industrial floorspace (23 hectares) to 2039 justified?
- (b) If the Plan were to be modified to look ahead to 2041, how would the industrial and warehouse floorspace requirement figure need to be modified?

M3 Responded to as below in italics (and acknowledged)

M3. Spatial strategy

3.1 The spatial strategy (policy SP1) and settlement hierarchy (policy SP3)

Q3.1 Does policy SP1 set out an appropriate spatial strategy that will contribute to the achievement of sustainable development? In particular:

- (a) Newbury retaining its key role as the administrative centre and major town centre, and being a focus for housing and business development and the main focus for office development.
- (b) Thatcham being a focus for housing and business development, regeneration and improved services and facilities.
- (c) Villages surrounding Newbury and Thatcham retaining their existing roles.
- (d) Theale being the focus for additional housing in the Eastern Area.

The LPR identifies three spatial areas whereas the current local plan identifies four. The nature of what are currently the Eastern Urban Area and the East Kennet Valley are different and combining them into the Eastern Area fails to recognise the more rural nature of the East Kennet Valley. Indeed Policy SP3 effectively recognises this

difference by differentiating between the urban areas (including Tilehurst and Calcot) and the rural service centres (including Burghfield and Mortimer).

Q3.1(d) fails to recognise the developments in various other locations (eg Tilehurst, Calcot, Burghfield and Mortimer) that are carried over from the current Plan. (Nb that SP1 doesn't mention Theale under the Eastern Area sub-heading.)

Q3.2 Is the settlement hierarchy defined in policy SP3 and tables 1 and 17 of the Plan appropriate and based on proportionate evidence?

So far as Mortimer is concerned, yes.

Q3.3 Are the settlement boundaries defined on the Policies Map appropriate and based on proportionate evidence?

So far as Mortimer is concerned, yes.

Q3.4 Does policy SP3 set out an effective and justified approach to allocating non-strategic sites at urban areas, rural service centres and service villages through neighbourhood plans?

So far as Mortimer is concerned, yes.

3.2 AWE Aldermaston and AWE Burghfield (policies SP4 and DM33 and Appendix 3)

Q3.5 Is policy SP4 relating to development within the Detailed Emergency Planning Zones, the 5km Outer Consultation Zones, and 12km Consultation Zones around AWE Aldermaston and AWE Burghfield consistent with national policy and relevant legislation?

We understand this to be the case (the Burghfield DEPZ extends slightly into the parish of Stratfield Mortimer).

Q3.6 Have the Atomic Weapons Establishments been appropriately taken into account in the determination of the spatial strategy, including the choice of housing and employment allocations?

(Question ignored).

3.3 North Wessex Downs AONB (policy SP2)

Q3.7 Is policy SP2 consistent with national policy relating to AONBs?

(Question ignored).

Q3.8 Have exceptional circumstances been demonstrated to justify allocating sites RSA14 to RSA23 having regard to national policy?

(Question ignored).

Q3.9 Is the Council's proposed modification to the reasoned justification of policy SP2 relating to policies RSA14 to RSA23 necessary to make the Plan sound and would it be effective in that regard?

(Question ignored).

Q3.10. Is the Council's proposed modification to the reasoned justification of policy SP2 relating to neighbourhood plans allocating sites for major development in the AONB necessary to make the Plan sound and would it be effective in that regard?

(Question ignored).

3.4 Housing requirements for neighbourhood areas

Q3.11 Are the housing requirement figures of 50 and 25 dwellings for Hungerford and Lambourn, and zero for all other designated neighbourhood areas, justified and consistent with national policy?

(Question ignored).

Q3.12 Are the Council's proposed modifications to policy SP12 (to state that the Council will supply a housing requirement figure for each neighbourhood area when a neighbourhood plan is being prepared or updated, and that any sites allocated in a neighbourhood plan would be additional to sites allocated in the Plan) necessary to make the Plan sound and would they be effective in that regard?

Allocating a housing requirement when a neighbourhood plan is being prepared should be part and parcel of the process. It isn't clear at what stage there would be an allocation where a neighbourhood plan is being updated and this could be clarified (for example, Stratfield Mortimer is (the only area?) preparing an updated plan and the LPR makes it clear that there will be no additional housing requirement over and above the requirement in the current plan currently being built out.

3.5 Settlement boundaries (policies SP1 and SP2)

Q3.13 Is the strategic approach of restricting development outside settlement boundaries set out in policies SP1 and SP2 justified and consistent with national policy?

We understand it to be consistent with national policy, and consider that it is justified to restrict development in the countryside outside settlement boundaries.

3.6 Separation of settlements around Newbury and Thatcham

Q3.14 Is policy DM2 justified and consistent with national policy? If so, will it be effective in preventing the coalescence of Newbury and Thatcham and maintaining the separate identity of the named settlements?

(Question ignored).

3.7 Key Diagram

Q3.15 Is the Council's proposed modification to include a key diagram in the Plan necessary to make the Plan sound and would it be effective in that regard?

(Question ignored).

3.8 Site selection methodology

Q3.16

(a) Were the sites allocated in the Plan selected on the basis of adequate and proportionate evidence?

(b) Collectively, are the allocations consistent with the spatial strategy and settlement hierarchy set out in policies SP1 and SP3?

(Question ignored).

By 22/03/24

M4. North East Thatcham strategic site (policy SP17)

4.1 Reasonable alternatives and the West Berkshire Strategic Vision 2050

Q4.1 Was the North East Thatcham site selected for allocation in the Plan following appropriate consideration of reasonable alternatives?

Q4.2 Is it necessary to modify the reasoned justification to policy SP17 to refer to the West Berkshire Strategic Vision 2050 in order to make the Plan sound?

4.2 Infrastructure

4.3 Transport infrastructure

Q4.3 What specific transport infrastructure projects and other measures are expected to be necessary to ensure the following in relation to the development proposed on the North East Thatcham allocation:

- (a) Appropriate opportunities to promote sustainable transport modes can be taken up.
- (b) Safe and suitable access to the site can be achieved for all users.
- (c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree at an appropriate time.

Q4.4 Will policy SP17, along with other relevant policies, be effective in ensuring the timely delivery of the necessary transport infrastructure projects and other measures to support development proposed at North East Thatcham?

4.4 Education infrastructure

Q4.5

- (a) Are the requirements of policy SP17 for early years, primary school and secondary school provision to meet the needs of the North East Thatcham development clear and unambiguous, and are they justified?
- (b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?

4.5 Health care infrastructure

Q4.6

- (a) Is the requirement of policy SP17 for a 450 sqm GP surgery on the site justified, and would it be effective in ensuring that the additional need for primary health care arising from the development can be met?
- (b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?

4.6 Community infrastructure

Q4.7 Is the requirement of policy SP17 for a 1,200 sqm indoor facility for sport and community uses on the site justified? Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?

4.7 Landscape and provision of green infrastructure

Q4.8 Will policy SP17, along with other relevant policies, be effective in ensuring the provision of a comprehensive green infrastructure network on the site including outdoor formal and informal sports pitches and other areas of open space to meet the needs of the development; a new community park linking Thatcham to the AONB; and greenways through the site for walkers and cyclists?

Q4.9 Will policy SP17, along with other relevant policies, be effective in ensuring the development proposed is sympathetic to its landscape setting, and preventing harm to the AONB and other valued landscapes?

4.8 Flood risk and surface water

Q4.10. Will policy SP17, along with other relevant policies, be effective in ensuring that the development will be safe from flooding for its lifetime and will not increase flood risk elsewhere

4.9 Air and noise pollution

Q4.11

(a) Is the location of the site suitable for the development proposed taking into account the likely effects of noise and pollution on the health and living conditions of future residents?

(b) If so, will the Plan be effective in helping to ensure that any potential adverse effects will be adequately mitigated?

4.10 Affordable homes and housing mix

Q4.12 Are the requirements in policy SP17 for

(a) at least 40% affordable homes and

(b) a mix of house types that complies with Table 3 in the Plan on the North East Thatcham site justified, including in terms of need and viability?

4.11 Self build plots

Q4.13 Is the requirement in policy SP17 for at least 3% of dwellings to be delivered via serviced custom/self-build plots justified, including in terms of need and viability?

4.12 Biodiversity

Q4.14 Will policy SP17, along with other relevant policies, be effective in minimising impacts on and providing net gains for biodiversity? In particular:

(a) Will sites of biodiversity value be protected and enhanced in a manner commensurate with their statutory status or identified quality?

(b) Will significant harm to biodiversity be avoided, adequately mitigated, or as a last resort compensated for?

(c) Will development avoid the loss or deterioration of any irreplaceable habitats?

4.13 Historic environment

Q4.15 Will policy SP17, along with other relevant policies, be effective in ensuring that the development proposed conserves and enhances the historic environment in accordance with national policy? If not, would the Council's proposed main modification ensure the Plan is sound in that respect?

4.14 Masterplanning and the Thatcham Strategic Growth Study

Q4.16 Does policy SP17 set out an effective approach to masterplanning to achieve the comprehensive development of the site along with the timely and coordinated provision of infrastructure and services? In particular:

(a) Is it clear who is responsible for preparing the various strategies referred to and the masterplan, what status those documents will have, and how they relate to each other and to the preparation and determination of planning applications?

(b) Will effective mechanisms be in place to ensure that all necessary physical, social and green infrastructure is provided in a timely and coordinated manner in relation to the proposed new homes?

Q4.17

(a) Is the requirement for proposals to respond positively to the guiding principles provided in the Thatcham Strategic Growth Study justified?

(b) If so, does it provide a clear and unambiguous approach for the preparation of a masterplan and preparation and determination of planning applications?

4.15 Viability and delivery

Q4.18 Is there a reasonable prospect that development proposed at North East Thatcham could start in 2029/30, and that 1,500 dwellings could be viably developed, meeting all of the requirements of policy SP17 and other relevant policies, by 2039?

Q4.19

(a) Could more than 1,500 dwellings be satisfactorily accommodated on the North East Thatcham site, meeting all of the requirements of policy SP17 and other relevant policies?

(b) If so, is it necessary to modify the reference in policy SP17 to refer to a different scale of development?

4.16 Policies map

Q4.20 Does the settlement boundary shown on the submitted policies map need to be changed around the North East Thatcham allocation? How could a new revised settlement boundary be defined on the adopted policies map following the studies and work identified in policy SP17?

Q4.21 Are the areas within the allocation defined on the policies map as country park and green links justified, and will they be effective in illustrating geographically the application of relevant parts of policy SP17?

Q4.22 Which policy in the Plan does the car park designated on the policies map relate to?

4.17 North East Thatcham map

Q4.23 Is the purpose of the North East Thatcham map in the Plan, and its relationship with the policies map, clear and unambiguous?

M5. Sandleford Park strategic site (policy SP16)

5.1 West Berkshire Strategic Vision

Q5.1 Is it necessary to modify the reasoned justification to policy SP16 to refer to the West Berkshire Strategic Vision 2050 in order to make the Plan sound?

5.2 Transport

Q5.2 What specific transport infrastructure projects and other measures are expected to be necessary to ensure the following in relation to the development proposed on the Sandleford Park allocation:

- (a) Appropriate opportunities to promote sustainable transport modes can be taken up.
- (b) Safe and suitable access to the site can be achieved for all users.
- (c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree at an appropriate time.

Q5.3 Will policy SP16, along with other relevant policies, be effective in ensuring the timely delivery of the necessary transport infrastructure projects and other measures to support the development proposed at Sandleford Park?

5.3 Comprehensive development and infrastructure provision

Q5.4 Does policy SP16 set out an effective approach to achieving the comprehensive development of the Sandleford Park site along with the timely and coordinated provision of infrastructure and services? In particular:

- (a) The expectation that proposals have regard, and respond positively, to the supplementary planning document adopted in 2015?
- (b) Will effective mechanisms be in place to ensure that all necessary physical, social and green infrastructure is provided in a timely and coordinated manner in relation to the 1,500 new homes?

5.4 Viability and delivery

Q5.5 Is there a reasonable prospect that 1,500 dwellings could be viably developed on the site, meeting all of the requirements of policy SP16, other relevant policies, and the supplementary planning document, during the plan period?

5.5 Settlement boundary

Q5.6 Is the Newbury settlement boundary defined on the policies map justified in relation to the allocation, and will it be effective in the implementation of policy SP16?

M6. Non strategic housing allocations

6.1 Non strategic allocations: Newbury and Thatcham

RSA1 Newbury College, Newbury (15 dwellings)

This is a retained allocation with full planning permission. It is controlled by Feltham Properties and 16 dwellings are expected to be completed in 2027/28.

Q6.1 Is there a reasonable prospect that allocation RSA1 will be available and at least 15 dwellings could be viably developed during the plan period?

Q6.2 Are the development parameters in policy RSA1 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

RSA2 Bath Road, Speen (100 dwellings)

Q6.3 Is there a reasonable prospect that allocation RSA2 will be available and at least 100 dwellings could be viably developed during the plan period? In particular, what type of

mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be in place and operational?

Q6.4 Are the development parameters in policy RSA2 justified, and will they be effective in achieving sustainable development on the site? In particular, is a main modification required to ensure policy RSA2 is effective with regard to the Speen Conservation Area?

RSA3 Coley Farm, Newbury (75 dwellings)

Q6.5 Is there clear evidence to indicate that 75 dwellings will not be built on allocation RSA3 by 2026/7?

Q6.6 Are the development parameters in policy RSA3 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

RSA4 Greenham Road, Newbury (160 dwellings)

Q6.7 Is there clear evidence to indicate that 160 dwellings will not be built on allocation RSA4 by 2026/27?

Q6.8 Are the development parameters in policy RSA4 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

Q6.9 Is the Newbury settlement boundary defined on the policies map justified in relation to the allocation, and will it be effective in the implementation of policy RSA4?

RSA5 Lower Way, Thatcham (85 dwellings)

Q6.10. Is there clear evidence to indicate that 85 dwellings will not be built on allocation RSA5 by 2026/27?

Q6.11 Are the development parameters in policy RSA5 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

6.2 Non strategic allocations: Eastern Area

RSA6 Stoneham's Farm, Tilehurst (C2 care home)

Q6.12 Is there a reasonable prospect that allocation RSA6 will be available and a 64 bed care home could be viably developed during the plan period?

Q6.13 Are the development parameters in policy RSA6 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

RSA7 Purley Rise, Purley (35 dwellings)

Q6.14 Is there clear evidence to indicate that 35 dwellings will not be built on allocation RSA7 by 2024/25?

Q6.15 Are the development parameters in policy RSA7 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

RSA8 Bath Road / Dorking Way, Calcot (35 dwellings)

Q6.16 Is there a reasonable prospect that allocation RSA8 will be available and at least 35 dwellings could be viably developed during the plan period?

Q6.17 Are the development parameters in policy RSA8 justified, and will they be effective in achieving sustainable development on the site?

RSA9 A340 / The Green, Theale (100 dwellings)

Q6.18 Is there a reasonable prospect that allocation RSA9 will be available and could be viably developed for 100 dwellings during the plan period?

Q6.19 Are the development parameters in policy RSA9 justified, and will they be effective in achieving sustainable development on the site?

RSA10 Whitehart Meadow, Theale (40 dwellings)

Q6.20 Is there a reasonable prospect that allocation RSA10 will be available and at least 40 dwellings could be viably developed during the plan period?

Q6.21 Are the development parameters in policy RSA10 justified, and will they be effective in achieving sustainable development on the site?

RSA11 Former sewage treatment works, Theale (60 dwellings)

Q6.22 Is there a reasonable prospect that allocation RSA11 will be available and at least 60 dwellings could be viably developed during the plan period?

Q6.23 Are the development parameters in policy RSA11 justified, and will they be effective in achieving sustainable development on the site?

RSA12 Pondhouse Farm, Burghfield Common (100 dwellings)

Q6.24 Is there clear evidence to indicate that 100 dwellings will not be built on allocation RSA12 by 2024/25?

Q6.25 Are the development parameters in policy RSA12 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)? In particular, if the extant planning permission were not to be implemented, should the site remain undeveloped due to it being within the Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield?

RSA13 A4 Bath Road, Woolhampton (16 dwellings)

Q6.26 Is there a reasonable prospect that allocation RSA13 will be available and at least 16 dwellings could be viably developed during the plan period?

Q6.27 Are the development parameters in policy RSA13 justified, and will they be effective in achieving sustainable development on the site?

6.3 Non strategic allocations: North Wessex Downs AONB

Q6.28 Is there a reasonable prospect that allocation RSA14 will be available and at least 60 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.29 Are the development parameters in policy RSA14 justified, and will they be effective in achieving sustainable development on the site?

RSA15 Newbury Road, Lambourn (5 dwellings)

Q6.30 Is there a reasonable prospect that allocation RSA15 will be available and at least 5 dwellings could be viably developed during the plan period? In particular, what type of

mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.31 Are the development parameters in policy RSA15 justified, and will they be effective in achieving sustainable development on the site?

RSA16 Southend Road, Bradfield Southend (20 dwellings)

Q6.32 Is there a reasonable prospect that allocation RSA16 will be available and at least 20 dwellings could be viably developed during the plan period?

Q6.33 Are the development parameters in policy RSA16 justified, and will they be effective in achieving sustainable development on the site?

RSA17 Chieveley Glebe, Chieveley (15 dwellings)

Q6.34 Is there a reasonable prospect that allocation RSA17 will be available and at least 15 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.35 Are the development parameters in policy RSA17 justified, and will they be effective in achieving sustainable development on the site? In particular, are main modifications required to:

(a) ensure the policy is effective with regard to the historic environment.

(b) propose a burial ground as part of the development.

RSA18 Pirbright Institute, Compton (140 dwellings)

Q6.36 Is there a reasonable prospect that allocation RSA18 will be available and at least 140 dwellings could be viably developed during the plan period?

Q6.37 Are the development parameters in policy RSA18 justified, and will they be effective in achieving sustainable development on the site?

RSA19 Spring Meadows, Great Shefford (15 dwellings)

Q6.38 Is there a reasonable prospect that allocation RSA19 will be available and at least 15 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.39 Are the development parameters in policy RSA19 justified, and will they be effective in achieving sustainable development on the site?

RSA20 Charlotte Close, Hermitage (15 dwellings)

Q6.40 Is there compelling evidence that 15 dwellings on allocation RSA20 will not be built by 2026/27? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.41 Are the development parameters in policy RSA20 justified, and will they be effective in achieving sustainable development on the site?

RSA21 Old Farmhouse, Hermitage (10 dwellings)

Q6.42 Is there a reasonable prospect that allocation RSA21 will be available and at least 10 dwellings could be viably developed during the plan period? In particular, what type of

mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.43 Are the development parameters in policy RSA21 justified, and will they be effective in achieving sustainable development on the site?

RSA22 Station Road, Hermitage (34 dwellings)

Q6.44 Is there a reasonable prospect that allocation RSA22 will be available and at least 34 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

Q6.45 Are the development parameters in policy RSA22 justified, and will they be effective in achieving sustainable development on the site? In particular, is a main modification required to ensure the policy is effective with regard to the historic environment?

RSA23 The Haven, Kintbury (20 dwellings)

Q6.46 Is there a reasonable prospect that allocation RSA23 will be available and at least 20 dwellings could be viably developed during the plan period?

Q6.47 Are the development parameters in policy RSA23 justified, and will they be effective in achieving sustainable development on the site?

M7. Housing land supply

Q7.1 Are the Council's proposed modifications to the reasoned justification to policy SP12 aimed at clarifying the overall housing land supply necessary to make the Plan sound and are they, in principle (irrespective of the figures), effective in that regard?

7.1 Allocations in existing plans retained and included in the Plan

Q7.2 Is the assumption that a total of 2,570 dwellings will be completed in the plan period on the 15 allocations retained from existing plans justified?

7.2 Stratfield Mortimer neighbourhood plan

Q7.3 Is the assumption that 82 dwellings will be completed in the plan period on land to the south of St John's School, The Street, Stratfield Mortimer justified?

Yes, the site is being built out and the phased development is on track to be completed as anticipated. Indeed, it is likely that the site will deliver a further 20 windfall dwellings over and above the 110 designated in the Stratfield Mortimer Neighbourhood Development Plan.

7.3 Allocations in existing plans not retained because under construction

Q7.4 Is the assumption that a total of 721 dwellings will be completed in the plan period on 8 allocations in existing plans that are not being carried forward in the Plan as they are at an advanced stage of construction justified?

7.4 Unallocated sites with planning permission / under construction

Q7.5 Is the assumption that a total of 2,229 dwellings will be completed in the plan period on unallocated sites that are under construction or have planning permission justified?

7.5 New allocations in the Plan

Q7.6 Is the assumption that a total of 1,720 dwellings will be completed in the plan period on the 9 new allocations in the Plan justified?

7.6 Sites to be allocated in neighbourhood plans

Q7.7 Is the assumption that a total of 80 dwellings will be completed in the plan period on sites to be allocated in the Hungerford and Lambourn neighbourhood plans, or through other opportunities identified by the Council, justified?

7.7 Windfall allowance

Q7.8 Does a windfall allowance of 140 dwellings per year represent a reliable source of supply having regard to the strategic land availability assessment, historic delivery rates and expected future trends?

7.8 Five year housing land requirement and supply

Q7.9 If the housing requirement range of 513 to 538 dwellings per year in policy SP12 is justified, what was the five year requirement on 1 April 2022?

Q7.10. Is the Council's assessment that there was a deliverable supply of 3,448 dwellings on 1 April 2022 justified? In particular:

(a) Is there clear evidence to demonstrate that any of the 2,922 dwellings on sites with full permission or outline planning permission for fewer than 10 dwellings will not be delivered by 31 March 2027?

(b) Is there clear evidence to demonstrate that 200 dwellings will be delivered by 31 March 2027 on SP16 Sandleford Park which has outline permission for 1,080 dwellings?

(c) Is the inclusion of 57 dwellings based on communal accommodation justified?

(d) Is the inclusion of a windfall allowance of 269 dwellings justified?

Q7.11 Does the housing trajectory demonstrate that a supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement in the Plan will be maintained annually?

7.9 Overall housing supply for the plan period

Q7.12

(a) Does the Plan need to be modified to identify additional deliverable sites and/or developable sites and/or broad locations in order to be consistent with national policy relating to meeting housing need?

(b) If so, what would be reasonable alternatives in the context of the spatial strategy set out in policy SP1?

M8. Requirements of housing developers

8.1 Affordable housing (policy SP19)

Q8.1 Are the requirements relating to affordable housing in policy SP19 justified and consistent with national policy, and will they be effective in ensuring that the overall need for new homes is met whilst maximising the delivery of additional affordable homes. In particular:

(a) Does the viability evidence indicate that the requirements for 20%, 30% and 40% in different types of residential development are achievable?

(b) Is the requirement for affordable housing provision on sites of between five and nine dwellings justified having regard to NPPF 64 and the Council's response to PQ39?

(c) The approach to site specific viability assessments and review mechanisms having regard to PPG ID:10-07 to 10-09.

(d) The approach to on- and off-site provision, having regard to NPPF 63.

(e) The requirements relating to tenure split and First Homes having regard to NPPF 65 and PPG ID:70-013-20210524.

(f) The requirement for 20% affordable private rent units in 100% build to rent schemes having regard to PPG ID:60.

(g) The approach to affordable housing provision in extra care housing schemes.

8.2 Density of housing development (policy SP1)

Q8.2 Are the requirements relating to the density of residential development in policy SP1 justified and consistent with national policy, and will they be effective in optimising the use of land and achieving well-designed places?

8.3 Housing type and mix (policy SP18)

Q8.3 Are the requirements of policy SP18 justified and consistent with national policy, and will they be effective in meeting the housing needs of different groups in the community? In particular:

(a) The requirement for all developments of 10 or more dwellings to provide a mix of dwellings sizes that reflects the proportions set out in Table 3.

(b) The requirement for all dwellings to be accessible and adaptable in accordance with building regulation M4(2).

(c) The requirement for around 10% of new market homes and a maximum of 5 units of the affordable sector to meet the wheelchair users standard M4(3), having regard to the Council's response to PQ37.

Q8.4

(a) Will the allocations in the Plan, and the last paragraph of policy SP18 along with policy DM18, be effective in encouraging the development of small and medium sized sites including for those who wish to build their own home?

(b) Will the Plan, along with the Council's brownfield register, be effective in accommodating at least 10% of the housing requirement on sites no larger than one hectare?

8.4 Internal space standards (policy DM30)

Q8.5 Is the requirement for all new market and affordable dwellings, including from permitted development, change of use and conversion, to comply with the nationally described space standard justified having regard to evidence of need, viability and timing?

8.5 Design quality (policy SP7)

Q8.6 Is policy SP7 consistent with national policy aimed at achieving well-designed places?

8.6 Sustainable homes (policies SP5 and DM4)

Q8.7 Are the requirements in policy DM4 relating to energy efficiency, space heat demand, net zero carbon operational energy, and carbon offsetting for all residential development consistent with national policy or otherwise justified?

8.7 Water quality, water resources and waste water (policies DM6 and DM7)

Q8.8 Are the requirements for residential development relating to water quality, water resources and waste water in policies DM6 and DM7 justified and consistent with national policy? In particular:

(a) The requirement in policy DM6c for all development within the hydrological catchments of the River Lambourn SSSI/SAC or River Test to demonstrate nutrient neutrality⁹⁶.

(b) The requirement in policy DM7 for all new dwellings to meet the optional Building Regulations requirement of 110 litres/person/day.

8.8 Green infrastructure and public open space (policies SP10 and DM40)

Q8.9 Are the requirements for residential development relating to the protection, enhancement and provision of green infrastructure and public open space in policies SP10 and DM40 justified and consistent with national policy? In particular, the requirement for development of 10 or more homes to, where possible, provide public open space on-site to a standard of 3-4.3 hectares per thousand population.

8.9 Biodiversity and geodiversity (policy SP11)

Q8.10. Are the requirements for residential development relating to biodiversity and geodiversity in policy SP11 justified and consistent with national policy?

8.10 Trees, woodlands and hedgerows (policy DM15)

Q8.11 Are the requirements for residential development relating to trees, woodlands and hedgerows in policy DM15 justified and consistent with national policy?

8.11 Residential amenity and gardens (policy DM31)

Q8.12 Are the requirements for residential development relating to the provision of private amenity space in policy DM31 justified and consistent with national policy?

8.12 Landscape character assessments (policy SP8)

Q8.13 Is the requirement in policy SP8 for all residential development to be accompanied by an appropriate landscape assessment justified and consistent with national policy?

8.13 Statements of heritage significance (policy SP9)

Q8.14 Are the requirements in policy SP9 for residential development affecting a heritage asset, including the provision of a “statement of heritage significance”, justified and consistent with national policy?

8.14 Health impact assessments (policy DM3)

Q8.15 Are the requirements in policy DM3 for health impact assessments justified and consistent with national policy?

8.15 Car parking and cycle storage (policy DM44 and Appendix 5)

Q8.16 Are the requirements for residential development relating to car, cycle and motorcycle parking and provision of electric vehicle charging points in policy DM44 justified and consistent with national policy?

8.16 Transport impacts and infrastructure (policies SP23, DM42 and DM45)

Q8.17 Are the requirements for residential development relating to the assessment and mitigation of impacts on the transport network, providing and improving transport infrastructure and facilitating sustainable travel in policies SP23, DM42 and DM45 justified and consistent with national policy?

8.17 Digital infrastructure (policy DM41)

Q8.18 Are the requirements for residential development relating to digital infrastructure in policy DM41 justified and consistent with national policy?

8.18 Infrastructure requirements and delivery (policy SP24)

Q8.19 Are the requirements in policy SP24 for residential development to make contributions to the delivery of all relevant infrastructure projects included in the Council's Infrastructure Delivery Plan justified and consistent with national policy?

M9. Other housing development management policies

9.1 First homes exception sites (policy DM16)

Q9.1 Is policy DM16 relating to First Homes exception sites consistent with national policy and guidance?

9.2 Rural exception sites (policy DM17)

Q9.2 Is policy DM17 relating to rural exception sites consistent with national policy?

9.3 Specialised housing (policy DM19)

Q9.3 Is policy DM19 relating to the provision of specialist housing justified and consistent with national policy, and will it be effective in ensuring that the identified housing needs of different groups in the community can be met?

9.4 Mobile home parks (policy DM21)

Q9.4 Is policy DM21, which states that proposals that would result in the loss of a mobile home park either in part or full will not be permitted unless it would provide 100% affordable housing which will meet locally identified needs, justified?

9.5 Residential use above non-residential units (policy DM22)

Q9.5 Is policy DM22, which supports the conversion of existing space and the provision of additional space above non-residential uses subject to various criteria being met, justified?

9.6 Residential development in the countryside (policies DM23 to DM27)

Q9.6 Are policies DM23 to DM27 justified and consistent with national policy?

9.7 Residential extensions and annexes (policies DM28 and DM29)

Q9.7 Are policies DM28 and DM29 relating to residential extensions and annexes justified and consistent with national policy?

M10. Gypsy, traveller and travelling showpeople accommodation

10.1 Need for additional gypsy and traveller accommodation (Table 7)

Q10.1 Does the Plan identify the need for additional gypsy and traveller accommodation based on robust, proportionate and up to date evidence?

Q10.2 How would Table 7 in the Plan need to be modified if the plan period were to be modified to 2022 to 2041, and to take account of any updated evidence relating to need?

10.2 Sites for additional gypsy and traveller accommodation (policies DM20 and RSA24)

Q10.3

(a) Does the Plan identify a supply of specific deliverable sites for gypsy and traveller accommodation sufficient to provide 5 years' worth of sites from 2022, and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15?

(b) If not, will the preparation of a separate development plan document by 2027 to identify additional opportunities be effective in ensuring that longer term needs for gypsy and traveller accommodation can be met?

10.3 Need for travelling showpeople accommodation (Table 8)

Q10.4 Does the Plan identify the need for additional travelling showpeople accommodation based on robust, proportionate and up to date evidence?

10.4 Sites for additional travelling showpeople accommodation (policy RSA25)

Q10.5 Will the Plan be effective in ensuring that the identified need for additional plots for travelling showpeople can be met, including if the plan period were to be modified to 2022 to 2041?

M11. Economic development

11.1 Strategic approach to employment land (policy SP20)

Q11.1

(a) Is the approach in policy SP20 to considering proposals that would result in the loss of existing employment uses outside designated employment areas justified and consistent with national policy?

(b) Are the modifications to policy SP20 proposed by the Council necessary to make the Plan sound?

11.2 Designated employment areas (policies SP21 and DM32 and Appendix 4)

Q11.2 Are the designated employment areas, including the detailed boundaries, as shown on the policies map justified?

Q11.3 Is the approach in policy DM32 to considering proposals for different types of development in designated employment areas justified and consistent with national policy?

11.3 Sites allocated for industrial and warehouse development (policies ESA1 to ESA6)

Q11.4 Are the allocations of sites ESA1 to ESA6 for industrial and/or storage and distribution uses, and the detailed boundaries to each, justified?

Q11.5 Will policies ESA1 to ESA6 be effective in ensuring that each allocation is developed in a satisfactory manner? In particular with regard to:

(a) The type and scale of development proposed on each site.

(b) Provision of safe and suitable access, including by sustainable modes, and mitigation of impacts on the transport network.

(c) Mitigation of impacts on the character and appearance of the area, including rural landscape.

(d) Mitigation of impacts on biodiversity.

(e) Requirements relating to heritage assets and archaeological assessments.

(f) Mitigation of air, water, noise and light pollution.

(g) Waste water treatment infrastructure.

Q11.6 Are all sites that are available and suitable for industrial and/or storage and distribution development allocated in the Plan?

11.4 Office development (policies SP20, SP22 and DM32)

Q11.7 Are there available sites that are suitable for offices that should be allocated for that type of development in the Plan?

Q11.8 Is the approach to considering proposals for office development set out in policies SP20, SP22 and DM32 consistent with national policy or otherwise justified?

11.5 Town centres and retail parks (policies SP22 and DM34)

Q11.9 Is the hierarchy of town centres identified in policy SP22 justified?

Q11.10. Are the boundaries to each town centre and primary shopping area defined on the policies map justified?

Q11.11 Is the approach in policy SP22 to considering development proposals within the town centres and primary shopping areas justified and consistent with national policy?

Q11.12 Is the approach in policy DM34 to considering development proposals in the three defined retail parks justified and consistent with national policy?

11.6 Economic development in the countryside (policies DM35, DM36 and DM38)

Q11.13 Are policies DM35, DM36 and DM38 justified and consistent with national policy and will they be effective in securing sustainable economic development in the countryside?

11.7 Equestrian development and horseracing industry (policy DM37)

Q11.14 Is policy DM37 justified and consistent with national policy and will it be effective in ensuring that development related to equestrian facilities, the horseracing industry, and Newbury Racecourse is sustainable?

11.8 Theale rail-road transfer site (policy DM43)

Q11.15

(a) Is policy DM43 consistent with policies in the West Berkshire Minerals and Waste Local Plan 2022-2037?

(b) Does policy DM43 provide a clear and unambiguous approach to the types of development that will be permitted?

M12. Other development management policies

12.1 Non-residential development and carbon emissions

Q12.1 Are the requirements in policies SP5 and DM4, aimed at ensuring that all non-residential developments, hotels and residential institutions contribute to West Berkshire becoming and staying carbon neutral by 2030, justified and consistent with national policy? In particular:

(a) The requirement to achieve net zero operational carbon emissions (regulated and unregulated energy) in policies SP5 and DM4.

(b) The approach to energy efficiency and minimum construction standards in policy DM4 part 2.

(c) The requirement for the provision of on-site renewable, zero carbon and low carbon energy technologies in policy DM4 part 3.

(d) The requirement for carbon offsetting in policy DM4 part 4.

12.2 Non-residential development and transport (policies SP23, DM42 and DM44)

Q12.2 Are the transport-related requirements in policies SP23, DM42 and DM44 for non-residential development justified and consistent with national policy, in particular the approach to the provision of parking facilities for bicycles, motorcycles, electric vehicles and other vehicles?

12.3 Pollution and air quality (policies DM5 and DM8)

Q12.3 Are the requirements in policies DM5 and DM8 aimed at ensuring that development does not lead to adverse effects on the environment or nuisance by pollution, and maintains or improves air quality, justified and consistent with national policy?

12.4 Flood risk (policy SP6)

Q12.4 Is policy SP6 consistent with national policy and associated guidance relating to development and flood risk?

We repeat our response to the initial consultation: "With respect to run-off on pre-developed sites the maximum discharge rate equivalent to 50% of the existing 1 in 100 year runoff rate is not acceptable. There is normally a logarithmic relationship between probability and run-off data. Thus 50% of the existing runoff rate has a priority of about 0.1 i.e. is a 1 in 10 year event. This is unacceptable and could lead to relatively frequent flooding. A 1 in 50 year runoff rate would be much more appropriate."

12.5 Water quality and resources (policies DM6 and DM7)

Q12.5 Are policies DM6 and DM7 consistent with national policy and guidance?

12.6 Historic environment (policies SP9 and DM9 to DM14)

Q12.6 Are policies SP9 and DM9 to DM14 consistent with national policy and guidance relating to the historic environment? Is it necessary to modify policy SP9 to delete reference to enabling development and add reference to Conservation Area Appraisals and Management Plans?

12.7 Community facilities (policy DM39)

Q12.7 Is policy DM39 consistent with national policy? In particular,

(a) the requirement for proposals for new and/or expanded community facilities to demonstrate a local need.

(b) The requirements relating to the loss of an existing community facility.

M13 Other soundness issues

Q13.1 Are main modifications required to any other parts of the Plan to ensure that it is sound?