

West Berkshire Council's response to comments received on the additional work undertaken by the Council in August 2016

The Council has limited its responses to addressing some factual inaccuracies or where there is a specific need to clarify particular points.

Respondent	Respondent's Comments	WBC Comments
AONB paper PS2 16		
Hungerford Town Council, Ashburn Planning Consultants	<ul style="list-style-type: none"> Terminology – any site developed for housing which has not been allocated is a windfall – not just "the vast majority". The Council's approach will lead to the allocated site being developed plus some windfalls. If HTC's approach were followed, less housing would be developed. 	<ul style="list-style-type: none"> Not all non-allocated sites are windfalls – some have already been identified and are referred to as 'identified sites'. The recently updated 5 year housing land supply document (September 2016) sets out the specific sites which are likely to deliver the housing requirement, explaining at paragraph 1.4 that "these include sites with planning permission, allocated sites, sites with permitted development for housing established through the prior approval process and other identified sites that are considered deliverable in the five year period. A windfall allowance is also included as evidence shows windfalls provide a reliable source of supply." HTC are misunderstanding the approach to meeting the housing requirement. Windfalls are expected to come forward and an allowance is therefore included for them.
North Wessex Downs AONB	<ul style="list-style-type: none"> Excluding brownfield sites is flawed as these sites are in principle acceptable in policy terms and therefore likely to be permitted. For example there is a site that has been promoted in Hungerford throughout the DPD process but never included. 	<ul style="list-style-type: none"> Brownfield sites tend to be within settlement boundaries. The Council has not allocated sites within settlement boundaries. It is unclear which Hungerford site is being referred to, but if it is within the settlement boundary it does not require allocation; instead it could come forward as a planning application and be assessed through the development control process, including compliance with policy.
Issue 1 (Homework 1-5)		
A2Dominion Nexus on behalf of	<ul style="list-style-type: none"> Policy C1 conflicts with CS1 and contradicts the objectives of the policy in 	<ul style="list-style-type: none"> The Council's approach to the DPD and timescale for review are well documented in Examination evidence and are

<p>Croudace Homes Gladman</p>	<p>seeking to ensure that the 10,500 housing target is a minimum and not a maximum.</p>	<p>therefore not repeated here. The wording of C1 is consistent with the Council’s overall approach to the DPD as a daughter document to the Core Strategy. The settlement boundaries have been reviewed in order for the settlement hierarchy to reflect the ‘at least’ 10,500 figure. This is already set out in Appendix 1 of the HSA DPD which shows the headline numbers. There is no inconsistency between CS1 and C1. The Council’s approach to, and timetable for preparing a new Local Plan (including the review of all settlement boundaries) based on a revised housing requirement has already been discussed through the Examination process.</p>
<p>CEG Charlesgate Homes Ltd Nexus on behalf of Croudace Homes</p>	<ul style="list-style-type: none"> • Various comments about the housing trajectory and the realism of the forecast delivery rates at Sandlesford. 	<ul style="list-style-type: none"> • The trajectory has been provided by the developer, who has recently confirmed (week beginning 26/9/16) that this still represents their most up to date position with regards to the delivery of the site. • There is potential for delivery of more than 1,000 dwellings within the plan period. A planning application is currently pending determination, and the developers have submitted a trajectory showing 1,500 units completed by 2025/26. Three housebuilders will be operating on the site with development on separate parcels programmed to be constructed simultaneously. • The Council does not consider that there is a need for a contingency policy in the event that Sandlesford does not come forward as soon as anticipated. The Core Strategy makes clear that at least 1000 dwellings are planned to be delivered by 2026 and the numbers in the DPD are based on delivery of 1,000 units at Sandlesford Park over the plan period. The developers’ trajectory shows the potential for a further 500 dwellings in excess of this and so there is an element of flexibility already built into the process. This is demonstrated in the Council’s latest Five Year Housing Land Supply (September 2016) <i>(added to the Examination Library)</i>.

Gladman	<ul style="list-style-type: none"> The Council has accepted in previous s78 inquiries that HSG.1 is out of date (para 2.3.6). The 665 figure in the SHMA is a figure that has to date not been subject to formal examination. Higher figures have in the past been found credible. Makes reference to the Firlands farm appeal decision (APP/W/0340/A/14/2228089), stating that a figure of 833 was found credible. 	<ul style="list-style-type: none"> The Council has never made such a statement. This is factually incorrect and does not represent the Council's position with regard to saved policy HSG.1. The starting point is that the FOAN will be met across the HMA, as required by Government guidance. Using the 665 figure for West Berkshire is therefore a sensible and policy compliant starting point, until a firm requirement is established through a review of the Local Plan. Regarding the 833 figure referred to in the Firlands decision, the Inspector was very clear that this was found an appropriate starting point for the appeal only – in the absence of a published SHMA at the time of the appeal. The Inspector sets out, in para 33 of the appeal that: "I must stress that this is not intended to pre-judge the outcome of work on the new SHMA for the HMA as a whole or indeed the preparation of a new Local Plan."
Issue 2 (Homework 6 to 12)		
Indigo Planning on behalf of Blue Living (Pincents) Ltd	<ul style="list-style-type: none"> The sole reason why the Pincents Lane site has not been allocated is due to the perceived highway impact. There is sufficient capacity built in to the mitigation schemes approved as part of the revised IKA scheme to accommodate 285 homes at Pincents Lane. Other sites referred to as having issues as follows, which would reduce the additional homes identified in HW8: <ul style="list-style-type: none"> Mill Lane (EUA039) –s.106 issues Land to the east of Sulham Hill (EUA031) – s.106 issues Stonehams Farm (EUA008) – s.106 issues Land between A340 and the Green (THE009) – landscape work should 	<ul style="list-style-type: none"> The Statement of Common Ground between the site promoters and the Council confirms that Highways is a key issue; however it is not correct to state that it is the sole reason why the site has not been allocated. Further information is set out in full in the SA/SEA. IKEA has now opened and there have been some issues of gridlock in and around the Pincents Lane area. This remains a concern to the Council with regard to this site, and the Council retains its previously stated position with regard to any allocation of the site being considered through the new Local Plan. Other sites referred to as having issues, Council response is as follows: <ul style="list-style-type: none"> Mill Lane (EUA039) – no reason that the s106 will not be completed within the agreed timeframe. Land to the east of Sulham Hill (EUA031) - no reason that the s106 will not be completed within the agreed timeframe.

	<p>reduce capacity</p> <ul style="list-style-type: none"> ▪ Land adjacent to Jct 12 (EUA025) – capacity concerns. 	<ul style="list-style-type: none"> ▪ Stonehams Farm (EUA008) - no reason that the s106 will not be completed within the agreed timeframe. ▪ Land between A340 and the Green (THE009) – based on additional landscape work. ▪ Land adjacent to Jct 12 (EUA025) – more realistic reflection of potential.
Nexus Planning	<ul style="list-style-type: none"> • Assume that comments regarding a lack of education capacity are made on the basis that the Henwick Park Scheme will come forwards. 	<ul style="list-style-type: none"> • This is incorrect. The application at Henwick Park was refused and an appeal will take place later this year. Homework item 9 clarifies that ‘<i>up until recently</i> Trinity School looked to be able to absorb the impact of a modest amount of new housing within its catchment area...’ (our emphasis). Trinity primarily serves the Newbury area, rather than Thatcham.
North Wessex Downs AONB	<ul style="list-style-type: none"> • Whilst the NWD agrees with the adoption of a landscape led approach it does not agree with the second stage of the assessment which identifies if a site would be appropriate if a landscape buffer were to be included to screen/soften the allocation. This demonstrates that harm would be caused and that mitigation is required to overcome the harm. 	<ul style="list-style-type: none"> • The NWD AONB is misunderstanding the Council’s approach. The Council therefore refers the Inspector to para 2.77 of its Written Statement for Issue 2 Question 2.3. This clearly sets out that ‘screening to make development acceptable is not considered an appropriate way to mitigate potential harm to an AONB’.
Issue 5 (Burghfield)		
Gladman Gail Johnson/Mark Willis Charlesgate Homes Ltd	<ul style="list-style-type: none"> • The Statement of Collaboration is not legally binding. • There are conflicts between landowners. • There are issues with delivering the necessary linkages. 	<ul style="list-style-type: none"> • There is no requirement within the DPD for a legal collaboration agreement. The statement of collaboration seeks to explain how the different parties agree to cooperate to promote and deliver the development area; in accordance with the HSA DPD. • The planning application for BUR02A has been submitted and includes an indicative Masterplan for the entirety of BUR002/002A/004. • As set out in PS/04/05/24 the policy seeks the exploration of

		options to provide footpath and cycle links. There are several options available to enable this to be delivered.
Issue 9 – Bradfield		
Simon Richmond-Knight	<ul style="list-style-type: none"> Comments about whether Bradfield Parish Council was consulted on BRS006 and whether this site has been fully consulted on. 	<ul style="list-style-type: none"> The email addresses of the Parish/Town clerks were taken from those held centrally by the Council. It was up to the Parishes if they wanted to display/publicise the consultation themselves. The site BRS006 was promoted during the preferred options consultation. It was assessed in a consistent way to sites that were promoted earlier. The site as a whole was ruled out as unacceptable on landscape grounds and was also assessed as having limited visual and built connections with the existing built form. This was set out in the SA/SEA which accompanied the HSA DPD to the regulatory proposed submission consultation. The site was therefore subject to the full regulatory consultation process.
Issue 12 – Compton		
AONB	<ul style="list-style-type: none"> Consider that approximately 200 dwellings could be accommodated. 	<ul style="list-style-type: none"> There is no evidence as to how this number of ‘approximately 200’ has been calculated. It is not justified by any evidence. It is unclear how the AONB has assessed that this quantum of development is appropriate for a service village such as Compton – or how this would concur with the primary and secondary purposes of designation of the AONB. The Pirbright Institute SPD was developed with active involvement from the local community to ensure that it reflected their comments. Compton Parish Council has now commenced work on a Neighbourhood Plan. If the numbers for the site are to be reconsidered, the Neighbourhood Plan could be the mechanism for taking forward this work.

Issue 16 – Hungerford		
<p>Stuart Davies Richard Hudson Ashburn Planning (on behalf of Hungerford Town Council) AONB</p>	<ul style="list-style-type: none"> • Concern that any second roundabout needed for the HUN007 development would be similarly brightly lit to the current roundabout at the intersection of Salisbury Road and Kennedy meadow and that this would have a detrimental impact on the AONB. • Concern about impact of street lighting and the consequent impact on the AONB. 	<ul style="list-style-type: none"> • The proposed policy for the site does not specify the type of junction that would need to be provided to the site. This would be subject to negotiations at the planning application stage. The site assessment sheets for the site state that “the type of junction would need to be considered and the speed limit would need to be relocated south of the site.” While a roundabout is preferred by the Council, due to the role a roundabout can play in traffic management, a right turn lane junction could be equally acceptable. This would be determined at planning application stage. • The Council does not require on street lighting in rural areas, except where there is a Highway safety requirement, or at the express wish of the parish council. Given the rural nature of Hungerford and its location in the AONB, the Council would be unlikely to insist on street lighting in this location. The roundabout at Kennedy Meadows was constructed at a time when there was less concern over light pollution and is not in line with the Council’s current approach to street lighting.
PS/04/05/19.1		
<p>Darcliffe Homes</p>	<ul style="list-style-type: none"> • Maintains its position that the visibility at the Long Lane/ Sulham Hill junction is adequate to cater for the additional trips generated by the development of site EUA 033. • Maintains its position that proposed development at Site EUA 033 would not, either in isolation or taken cumulatively with development of EUA 008 and EUA 031, trigger a requirement for the widening of the southern part of Long Lane. 	<ul style="list-style-type: none"> • Regardless of the visibility splays, the Council’s LCA makes clear that EUA031 and EUA033 should not be delivered together

