

West Berkshire Local Plan Review (LPR) to 2036

Consultation Statement for

Regulation 18 consultation (undertaken from 9 November - 21 December 2018)

June 2019

1. Introduction

- 1.1 The Council is currently reviewing its Local Plan to cover the period to 2036. We are still in the early stages of this Review (LPR) which is known as the Regulation 18 stage.
- 1.2 Between February and March 2018 we invited comments on the proposed [scope and content of the Local Plan Review](#) (LPR) as the first part of our consultation under Regulation 18 of the Town and Country Planning (Local Development)(England) Regulations 2012. The [comments and suggestions](#) we received as part of that work continue to inform the development of the spatial strategy and both strategic and local policies as appropriate. They also gave us an important steer as to what our priorities should be.
- 1.3 As part of the development of the Review we undertook a [second round of Regulation 18 consultation](#) from 9 November to 21 December 2018. This took into account revised national policy (as set out in the [National Planning Policy Framework](#) that was published in July 2018¹) and the revisions made to parts of the national [Planning Practice Guidance](#).
- 1.4 We sought comments on our proposed:
- vision for the LPR;
 - revision of the existing spatial areas;
 - methodology for reviewing the existing settlement hierarchy;
 - criteria for the settlement boundary review; and
 - update of our assessment of existing Local Plan policies.
- 1.5 This statement sets out a summary of the comments received to this consultation and the Council's response to them².

¹ In February 2019 the Government published another [revised version of the NPPF](#). This contains minor clarifications to the NPPF that was published in July 2018. None of these clarifications would materially alter any of the responses we received as part of Regulation 18 consultation.

² Please note that the Council is not commenting on the suitability or otherwise of any of the individual sites being promoted through the Housing and Economic Land Availability Assessment (HELAA) at this stage. The HELAA will be published later this year.

2. Regulation 18 Consultation

- 2.1 In all, there were 123 respondents to the consultation with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. There were 438 comments made in total.

Question	Number of comments
Q1: Vision	81
Q2: Spatial areas	85
Q3: Settlement hierarchy	71
Q4: Settlement boundaries	70
Q5: Updated policies	61
Other comments	71
TOTAL COMMENTS	438

- 2.2 A summary of the respondents' comments to each question is provided below with the full responses available to view on our [Consultation Portal](#)
- 2.3 It is important to make clear that all comments made have been noted and will be given full consideration at the appropriate stage in the LPR.

3. Q1: Do you agree with our proposed Vision?

Summary of comments received:

- 3.1 In general there was broad support for the Vision and its inclusion as a context for the Strategic Objectives was welcomed. Opportunities were highlighted where the Council could work with town and parish councils in order to deliver the LPR.
- 3.2 Our neighbouring authorities were broadly supportive of the Vision. Further expansion on what new housing would bring to the District was considered to be beneficial and consideration of the impact that new housing development in particular may have on the infrastructure of adjacent authorities. The Royal Borough of Windsor and Maidenhead was the exception, expressing concern that our approach would not be compliant with the NPPF because it may not meet the appropriate needs of all relevant households, particularly in relation to in migration, economic development and constrained housing and employment market areas elsewhere.
- 3.3 The importance of setting and considering the Vision in the context of the wider area both in terms of housing, employment and also infrastructure was highlighted by others, as was the consideration of other strategies. The objectives of the Thames Valley Berkshire Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP), for instance, highlights the critical importance

of addressing housing availability and affordability to support local economic growth.

- 3.4 Whilst supporting the Vision, some respondents felt it was too broad and generic and should be more specific to West Berkshire. Some particular suggestions included highlighting the AONB and the challenges facing young people in the rural villages to the west of the District.
- 3.5 A recognition of the rural nature of the District and the challenges that brings was felt to be important generally and that flexibility should be introduced into the Vision to allow for that.
- 3.6 Some of those in the development industry felt that the housing needs of the District were the major issue to be addressed through the Local Plan and that the need to accommodate these should be prioritised and set out at the beginning of the Vision rather than the current economic focus in the first paragraph. In addition, providing 'sufficient housing' was not considered to be an aspirational aim by one respondent.
- 3.7 The fact that the vision should be implemented flexibly, accepting that housing needs can be met from a variety of sources including both large and small sites, with every settlement within the hierarchy capable of making a meaningful contribution towards the District's overall housing needs was stressed by those in the development industry. The role of previously developed land was highlighted by some and a bolder vision with regard to these sites suggested. There were also a variety of promoters who put forward specific sites which they considered would help achieve the Vision.
- 3.8 More specific wording and clarifications on particular issues were requested, particularly from those relating to environmental issues. These included matters such as water quality and pollution. Whilst welcomed by some, the reference to 'outstanding' in relation to the District's landscape and historic assets was felt to be misleading and a more measured approach was considered to be more appropriate. Some disappointment was expressed at the omission of particular wording such as 'sustainable development' and 'landscape led'.
- 3.9 Whilst the encouragement given to economic development was welcomed, it was put forward that the current wording suggests a focus upon the establishment of new businesses within the area, rather than a recognition of the needs of existing businesses which it was argued should be allowed to grow and adapt to changing circumstances, in order to remain prosperous.
- 3.10 Although not directly consulted upon, the updated Strategic Objectives did generate some comment. The importance of them flowing from the Vision was stressed. Specific amendments to the wording of a few objectives were proposed.

Council response:

- 3.11 The consultation responses indicated broad support for the inclusion of a Vision and this is welcomed. Providing an overall context for the Local Plan Review (LPR) strategic objectives, the development of a Vision had arisen as a result of the responses to the consultation on the LPR Scoping Report in February / March 2018.
- 3.12 It is acknowledged that the main concerns of consultees related to the actual detail of the Vision. The Council therefore intends to undertake further work to see if we can strike a balance between making it more West Berkshire specific, picking up some of the particular issues raised, whilst still retaining a strategic outlook.
- 3.13 Encouragingly, there were plenty of opportunities highlighted where the Council will be able work with town and parish councils to deliver the LPR and these will be actively pursued.
- 3.14 More specific wording on particular issues was requested and some tightening up of the draft text, which is helpful. We intend to look at these in detail and amend the draft text as appropriate.
- 3.15 We will also look at the relationship of the Vision to the Strategic Objectives to ensure it is clear. In addition, although not directly consulted upon, the updated Strategic Objectives generated some useful comment and so will be considered again in this context.

4. Q2: Do you agree with our proposed revision of the existing spatial areas?

Summary of comments received:

- 4.1 Although about a quarter of respondents did not express an opinion either for or against our proposed revision of the spatial areas, of those that did, comments were divided. Whilst most comments were accepting of the AONB and Newbury/and Thatcham spatial areas, most of the responses that were against any revision related to the proposed change to combine the existing Eastern Urban Area and Theale with the East Kennet Valley. Local communities and site promoters who felt that would be directly affected by such a change were particularly concerned. AWE also continued to express concern about potential development at Grazeley.
- 4.2 It was noted by a few respondents that other than their geographical locations adjacent to each other, there was little synergy between the current Eastern Area and the East Kennet Valley. The Eastern Area is very urban in nature with much, but not all, of the undeveloped land forming part of the North Wessex Downs AONB. It has a strong functional relationship with the rest of Reading. By contrast, the East Kennet Valley is characterised by a number of smaller villages located along transport routes and in the wider countryside.

Many of these areas have a stronger relationship with Newbury and Thatcham.

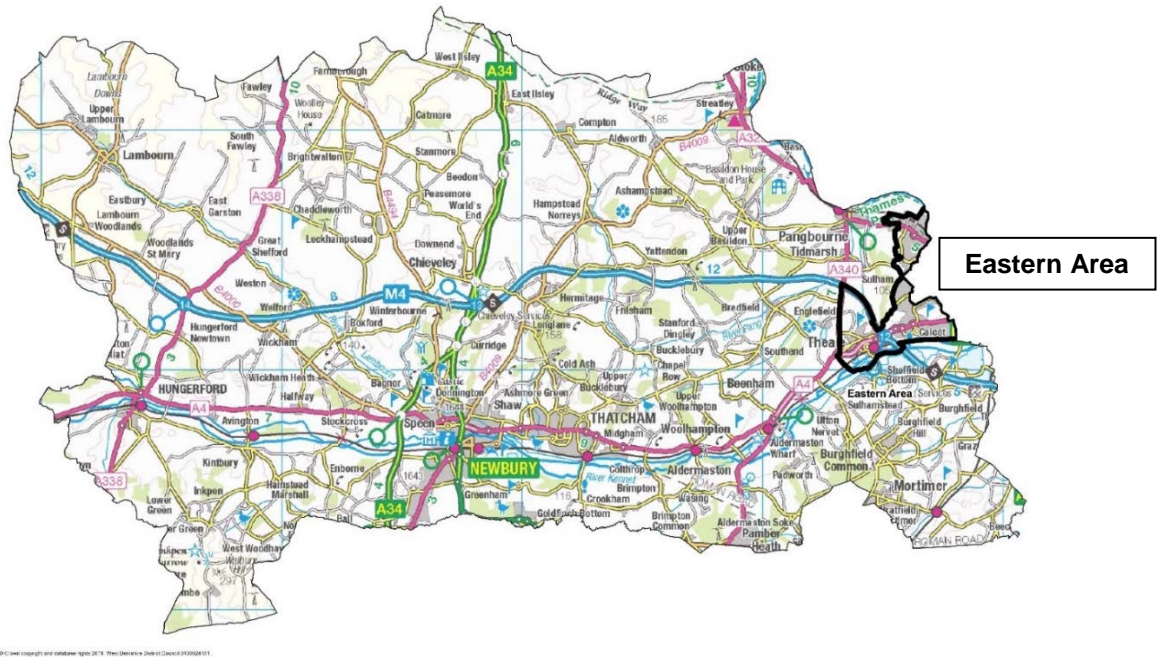
- 4.3 The parish councils in the Kennet Valley were concerned that the East Kennet Valley would become, in effect, a suburb of Reading. They felt each area and community required different approaches to both development and infrastructure delivery. Despite this, one respondent from the development industry felt that combining the two areas would have actually no practical effect on the constraints to development. Whilst the Eastern Area was constrained by the AONB, there still remained opportunities for sustainable development on the edge of the existing settlements. It was noted that the constraints associated with AWE remained, whether the East Kennet Valley was combined with the Eastern Area or remained separate. It was felt that the creation of a new Eastern Spatial Area would provide greater justification for the consideration of a large-scale strategic development at Grazeley. Considered as part of a wider Eastern Area, the new housing could contribute towards housing need within the current Eastern Area and within the Greater Reading Area Urban Area to which it would be well related. It was stressed though that whilst this might be a sustainable option for growth within West Berkshire District, it should not be pursued at the cost of further small-scale development within the Calcot/ Tilehurst/Purley area.
- 4.4 There was more support for the proposed revision from other respondents not directly affected. Cold Ash Parish Council and Thatcham Town Council questioned whether the more rural areas surrounding the larger towns should be included in the Newbury and Thatcham area as this could lead them being treated more in an urban than a rural context. A suggestion was made that Cold Ash should be included in the AONB spatial area instead. Thatcham Town Council also thought the Newbury and Thatcham spatial area should include the land at Lower Way Farm.
- 4.5 General support was expressed for the identification of the AONB spatial area although concern was raised that the area still needs to thrive and that the vitality of rural settlements across the District should be supported, regardless of whether there was any large scale development at Grazeley. The importance of the spatial strategy containing enough flexibility to enable small to medium sites to be allocated and delivered in the short-term was stressed. It was felt that policies relating to this spatial area should recognise the diversity in the character and form of settlements and modest growth that would support existing settlements such as at Hungerford be encouraged. Streatley was used as a particular example where development has not occurred despite its proximity to Goring which is classed as a larger village in the South Oxfordshire hierarchy.
- 4.6 There were also some respondents, particularly from the development industry, who thought that the division of the District into spatial areas was both complicated and unnecessary and that simply having a clear settlement hierarchy applied across the District was sufficient. Concern was expressed that the Council would arbitrarily set targets for the various spatial areas with no evidence to support the intended split between them. They stressed that the benefit of using a spatial hierarchy approach only was that there would

then be clarity where unmet needs could not be met within a given tier as they would be distributed to another tier in the hierarchy starting from the top-down. Unmet needs from any given tier could be met in the most sustainable locations first. It was noted that this approach was relatively standard across the country, including those authorities which include large areas of Green Belt and AONB. The respondent felt there could then be no claim that needs could not be met unless it could be categorically shown that no acceptable sites existed within sustainable settlements.

Council response:

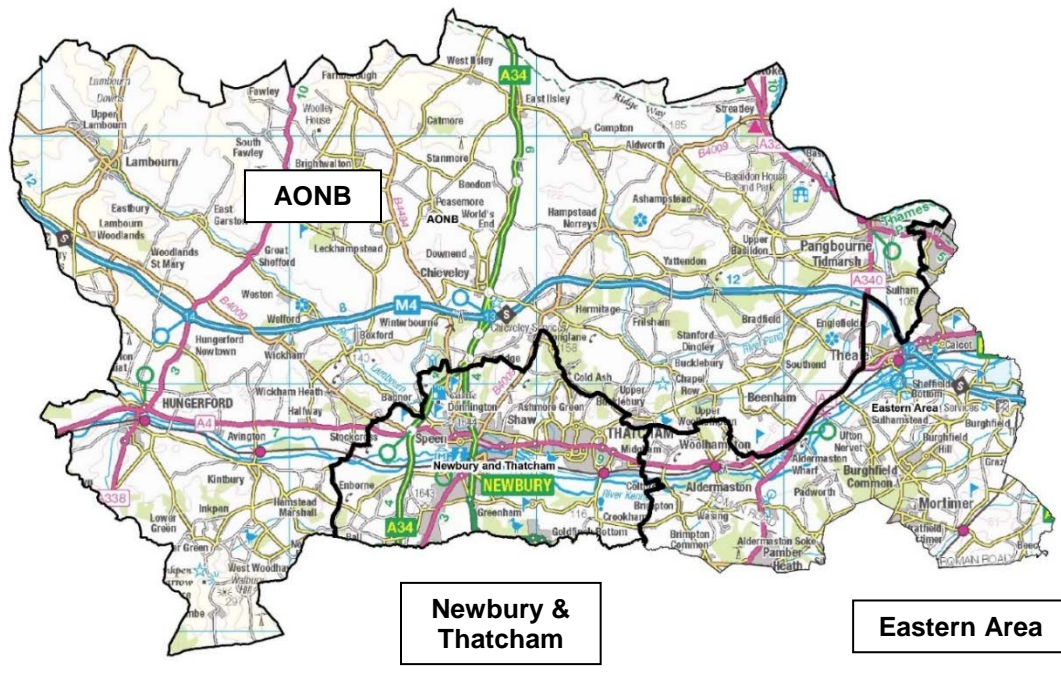
- 4.7 It is fair to say that the proposed amalgamation of the Eastern Area with the East Kennet Valley created most discussion. The disparities between the two areas were highlighted and genuine concern was raised that the individual identities of each would be lost if they were combined.
- 4.8 In taking these issues forward it is important to make clear that the conservation and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside is key to our spatial approach and remains one of the strategic objectives of the LPR.
- 4.9 What is also important to recognise is that there are significant differences in character within all of the spatial areas – whether existing or proposed. The Newbury and Thatcham spatial area, for instance, contains a significant rural hinterland which includes villages such as Cold Ash and Enborne and which visibly contrasts in character with the more urban areas of Newbury and Thatcham. Similarly, in the existing Eastern Area the rural hinterland to the north of Theale contrasts greatly with the urban areas of Calcot and Tilehurst. It is clear that we will need to ensure that differences in character are drawn out clearly in any descriptive text for each of the spatial areas.
- 4.10 Functional relationships were also cited as a reason to not combine the Eastern Area with the East Kennet Valley with respondents arguing that the Eastern Area looks towards Reading and the East Kennet Valley towards Newbury and Thatcham. In reality the situation is much more complex. Neither area can be seen in isolation and both clearly interact with each other and with the AONB and Newbury Thatcham spatial areas too. The rural service centre of Theale currently sits on the edge of the Eastern Area but it could easily be argued that it has more in common with the East Kennet Valley. Combining the two spatial areas would therefore assist when considering the role and function of Theale in the wider context.
- 4.11 In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation (see figure 1 below). In 2010, when the Core Strategy was being prepared, the Eastern Area was originally a broad area for development that included Pangbourne and a small area of the AONB running along the edge of the main urban area. However, through the Core Strategy examination process this area was reduced to exclude all parts of the AONB and so ultimately, the adopted Eastern Area is smaller than originally envisaged. This has since created challenges in delivery.

Figure 1: Existing Eastern Area spatial area



4.12 In reality, combining the two existing spatial areas as proposed (see figure 2 below), will simply be more practical and give the Council more flexibility in strategic planning terms. It also needs to be considered in the context of national guidance. The National Planning Policy Framework (NPPF) makes clear that in order to be considered sound, plans and policies have to be both flexible and deliverable.

Figure 2: Proposed Spatial Areas



- 4.13 For the reasons outlined above, the Council will therefore amalgamate the existing Eastern Area with the existing East Kennet Valley as originally proposed.

5. Q3: Do you agree with the methodology we propose to use for reviewing the existing settlement hierarchy?

Summary of comments received:

- 5.1 The overall approach of having a settlement hierarchy was generally endorsed. The two stage quantitative and qualitative process was also supported. Various respondents, particularly from the development industry used the opportunity to put forward arguments as to where, why and how, particular settlements should be considered within the hierarchy.
- 5.2 It was considered important that the proposed methodology should identify the most sustainable settlements to accommodate future development. A few respondents considered the review should be of all settlements, whether they had defined boundaries or not. Some also felt there was a need to distinguish between those within and outside the AONB.
- 5.3 There was concern expressed from a few in the development industry that our approach would not take into account the potential for settlements to be sustained by, and acquire improved facilities or services as a result of sustainable development taking place or proposed to take place.
- 5.4 There were some suggestions relating to the various categories of settlements. One respondent thought that rural service centres should be divided into two groups in relation to their access to a railway station. Another noted that while there are currently two additional types of area where there will be more limited development (smaller villages with settlement boundaries and open countryside), consideration should be given to a third category between the two, to recognise settlements or parts of settlements that have a looser pattern of development (but not so loose to be reasonably described as 'isolated') but nevertheless relate to a settlement with a boundary. Given the diverse nature of the settlements across the North Wessex AONB spatial area, it was felt that there were many groups of dwellings that would fit into this category
- 5.5 There were a variety of comments and concerns expressed in relation to the scoring of facilities and services. There was criticism from some that no explanation had been provided to how the points were allocated to each of the criteria.
- 5.6 One respondent commented that the audit of services and facilities speaks to the performance of the settlement in terms of accessibility (to services, facilities and employment) rather than sustainability and so the text should be amended to reflect that.

- 5.7 Clarification was sought on a number of issues and it was felt that further justification may be required to determine the points system with regard to certain facilities and services. In some circumstances it was argued it was unclear why a particular service secured a higher score than another. For instance, it was felt it was unclear why a village hall / community hall should score higher than a permanent library. Both offer community facilities and were often a source of local information.
- 5.8 A few respondents thought it was important that the points awarded should be weighted to take account of partial provision, for instance, the part time provision of Post Office facilities through the existence of outreach services or the provision of a mobile library. In addition, clarification on whether services and facilities had to be a unique facility or whether they could be combined with one another, such as a community hall, were also sought.
- 5.9 The scoring given to public transport was raised by quite a few respondents. Some felt that that further weighting should be given to accessibility by public transport and that there should be a distinction between bus and rail services. It was thought that the presence of a railway station had been underplayed and that it was not clear why accessibility to a railway station scored the same as accessibility to a bus service to a larger centre. It was argued that a rail service provided a greater level of accessibility to higher order settlements where people could have access to a greater range of services and facilities. The frequency of services was also considered important.
- 5.10 Questions were also raised with regard to the scoring for schools. It was highlighted that many of the significant villages in the District have a primary school but few have a secondary school. It was argued that given the amount of travel associated with secondary school education and the facilities and services that these establishments offered, additional weighting would be justified.
- 5.11 The consideration of a settlement's wider access to services and facilities within its vicinity and locality was acknowledged by some but it was considered important that an explanation of how the 1km was defined (whether from the centre of a settlement or its boundary) was justified within the methodology. A point made by a few respondents was that it should be acknowledged that services and facilities may be located in an adjoining authority, or outside of a settlement. In addition, a clearer definition of what is meant by access 'to business employment opportunities of an *appropriate size* within the settlement or within 2km of the centre of the settlement' was considered essential.
- 5.12 It was argued that some of the criteria were not necessary: a dental surgery was not regarded as a day to day requirement and so both its inclusion and score of three points were questioned. Similarly, whilst a health centre may be a more frequent requirement for some, it was argued it was not reasonable to expect one to be located in each settlement due to the changes in the way healthcare services are now delivered. Additionally, the presence of a bank/building society was not felt to be an indicator of sustainability any more, given the rise of internet banking.

- 5.13 There were a number of suggestions proposed for addition criterion:
- availability of broadband
 - car parking provision
 - the level of community involvement
 - sheltered accommodation
 - restaurants and takeaways
 - supermarket
 - existing development commitments, both permitted and planned
 - number of dwellings
 - population
 - properties / floorspace liable for business rates
- 5.14 It was also felt that the distance from urban centres (both within and outside the District) should be included because the sustainability of settlements in locational terms is relative, not only to the services/facilities within the settlement itself, but also in relation to services/facilities in other settlements.
- 5.15 The statistical scoring exercise was noted as being a starting point and the qualitative assessment was generally welcomed. There was clear support for any decisions made through it to be transparent and informed by evidence. A respondent from the development industry was particularly keen that the Council showed flexibility even with the hierarchy in place.
- 5.16 There were various suggestions put forward as to what the qualitative assessment should include, such as consideration of the availability of potential development sites and long-term land holders that might act as development partners, the presence of significant redundant or brownfield sites and the proximity to employment opportunities or good accessibility links. It was also argued that there should be consideration given to the future potential of each settlement to support sustainable growth.
- 5.17 Furthermore, concern was expressed that there were no details as to what the scoring thresholds would be for classifying different settlements. It was felt that this should be clearly set out in the final methodology before the assessment starts so that the process is completely transparent.
- 5.18 Finally, there was a strong support for further consultation on the settlement hierarchy and the evidence/analysis that supports it as the Local Plan Review progresses particularly with parish councils.

Council response:

- 5.19 The settlement hierarchy plays an important role in identifying sustainable locations for development. It categorises the District's settlements according to their different roles and groups them accordingly. The general endorsement given to the principle of our approach, particularly the two stage quantitative and qualitative process, is therefore welcomed.
- 5.20 We acknowledge that the provision of services and facilities within settlements can change over time and so that is why we are updating our existing assessment of settlements as we plan for the period to 2036. By assessing existing settlements at this early stage of the LPR we can ensure the spatial strategy is based on an accurate and up to date reflection of the role of settlements within the District.
- 5.21 It is acknowledged that the main concerns of consultees relate to the actual detail of the methodology, particularly the clarity surrounding the points given to specific services or facilities. We therefore intend to undertake further work on the points system in light of the comments made. This will include:
- whether additional weighting should be given to the part time provision of services; the sharing of services; accessibility by public transport; the distinction between rail and bus services and; the provision of a secondary school.
 - Consideration of whether some criterion should be removed e.g. dental surgery or bank/building society
 - Consideration of the additional criterion proposed
 - Scoring thresholds
 - Clarification of some of the definitions used
- 5.22 We recognise that further work will need to be undertaken to assess whether the existing categories within the hierarchy continue to remain the most appropriate going forward to 2036. To some extent this will depend on the outcome of both the audit of existing services and facilities and the qualitative assessment.
- 5.23 The responses clearly showed that involvement in the evolution of the settlement hierarchy is important for many stakeholders and this is welcomed. The importance of a sound evidence base will be key to its success and so the interest expressed from parish councils is particularly encouraging. We will be contacting each of them as part of the quantitative assessment to clarify the level of services and facilities within each settlement as appropriate.

6. Q4: Do you agree with the criteria we have set out for reviewing the settlement boundaries?

Summary of comments received:

- 6.1 The majority of respondents agreed with the principle of the Council's landscape led approach to the drawing of settlement boundaries. One favoured a community led approach instead. Another respondent considered that using physical boundaries was not necessarily a useful way of defining landscape impact and another was unclear how this would work in practice. A few respondents from the development industry disagreed with the principle of boundaries altogether, feeling that they didn't accord with the principles of the NPPF and by creating a binary approach, did not allow enough flexibility to allow for appropriate development to come forward. Another thought that it should include greater consideration of the economic and social benefits resulting from development, particularly in the AONB.
- 6.2 The use of the existing evidence base was welcomed although one respondent questioned the up to datedness of some of the studies quoted. The use of Historic Landscape Characterisation in particular was welcomed by some. Historic England noted that the specific issues to be considered on a site by site basis should include the potential impact on the significance of designated and non-designated heritage assets, which may require a specific Heritage Impact Assessment. Parish plans were also mentioned as being useful evidence. The Environment Agency also made clear that if any settlement boundary were close to a main river corridor then it would expect to see an ecological buffer zone between the edge of the settlement and the top of the riverbank.
- 6.3 Whilst the use of the higher level studies was supported, one parish council suggested that the relative weighting between the landscape studies and the physical attributes could usefully be clarified. Another respondent also argued for further clarification as to their relationship and thought this would be an important issue particularly when considering settlements within or closely related to the AONB.
- 6.4 Clarity regarding the inclusion of sites allocated through the local plan process was sought. It was also assumed the review of settlement boundaries would be undertaken after the assessment of potential site allocations had been completed. The issue of whether to include the whole of the allocated sites within the boundary or whether to just include the developable area was also raised. It was considered essential that the review of settlement boundaries takes account of all development which has taken place since the boundaries were first drawn up or last reviewed and that this included sites with extant planning permission. There were a number of respondents from the development industry who made specific comments in relation to individual sites that are being promoted for development and felt should be included within any settlement boundary review. It was argued that the policy approach should allow for development proposals 'within or adjacent to a settlement boundary'.

- 6.5 One respondent commented that revisions to the settlement boundaries should be informed by the updated LHN figure. It was also argued that settlement boundaries should be flexible and be drawn to allow windfall development if the Council was going to rely on them for five-year land supply calculations and housing trajectories. There was a suggestion that settlements in the AONB should be treated differently to those outside.
- 6.6 Although some examples of what the Council means by '*clearly defined physical features*' were given, one respondent felt the process would be more transparent if a more comprehensive list were provided and that this should consider the permanence of features. A feature that is more likely to remain static over time, such as an adopted road, would act as a robust boundary whereas boundary features such as hedges could easily be removed and prone to change over time.
- 6.7 The proposal to include '*individual plots or other similar scale development opportunities*' caused some discussion. A few thought they shouldn't be included as it wouldn't be plan led, whereas others, particularly from the development industry, welcomed the flexibility they would bring to the long term sustainability of settlement, particularly in rural areas. Some argued that the reference was unclear as to what size of plot was being referred to, whereas others thought it was unnecessarily restrictive and where a plot could accommodate several houses, it should be assessed on its own merits.
- 6.8 It was argued that there was a tension between allowing for '*individual plots or other similar scale development opportunities*' and the exclusion of '*open undeveloped parcels of land on the edges of settlements*'. It was suggested that the wording should be revised to include '*small sites where development would form a logical complement to the existing pattern of development and sites allocated through the local plan process.*'
- 6.9 Some respondents argued that some of the criteria proposed for excluding land from the settlement boundary were overly restrictive and unclear. These should instead be lists of features and characteristics that would be taken into consideration, with greater emphasis being given to specific issues to be considered on a site by site basis.
- 6.10 The proposal to exclude some existing developed areas, including loose knit buildings, farm buildings and farmyards, horse related development and public utilities (sewage treatment plants, substations) from settlement boundaries where they are located on the edge of a settlement caused concern from some in the development industry. It was argued that such sites are likely previously developed in nature and could, if surplus to operational developments in the future, provide obvious development sites well related to their communities. It was asserted that such sites should be assessed on a case by case basis but should be considered for inclusion within the settlement boundary as a default position.

Council response:

- 6.11 The overwhelming support given to the principle of the Council's landscape led approach to the drawing of settlement boundaries is welcomed.
- 6.12 We are currently updating some of the evidence base with a Landscape Character Assessment for West Berkshire due to be completed later this year and this will help in providing a context for the review of settlement boundaries.
- 6.13 It is appreciated that whilst the principle of the approach was supported, clarity was sought in some of the detail. We therefore intend to undertake further work on the practical application of dealing with the inclusion of individual plots or other similar scale development opportunities. Other issues will be considered and incorporated as appropriate as the review progresses.

7. Q5: Do you agree with our updated assessment of policies?

Summary of comments received:

- 7.1 Although this consultation related to our 'updated' assessment of policies, some comments made previously in our Feb - March 2018 were reiterated and reinforced using the revisions made to the NPPF. At the same time, others felt there was not enough information to be able to make an assessment or that the information was not presented clearly enough to comment.
- 7.2 In general, the ability of the policies to incorporate flexibility was stressed, particularly from those in the development industry. Considering the 'bigger picture' with the ability to accommodate various scenarios was important. There were offers of help to work together from a number of respondents on either individual policies, those relating to specific spatial areas and also relevant supporting documents and guidance. Clarifications were also sought on specific policies, with the importance of the linkages between the policies and the Vision stressed.
- 7.3 A number of comments were made relating to the economy. Some respondents stated that the role of the and function of the Protected Employment Areas (PEA) should be reviewed in light of the evidence produced from the Functional Economic Market Area Assessment (FEMA) and the Economic Development Needs Assessment (2016). It was also argued that many sites within the PEAs are currently underutilised and could be more sustainable if redeveloped for mixed use schemes. It was also noted that Green Park should be recognised as a key employment location and as such would need to continue to be supported by the enhancement of transport and infrastructure.
- 7.4 Both Newbury and Thatcham town councils advocated specific policies relating to their areas. A new business park, designed especially for new and

innovative businesses at A34/ M4 Junction 13 and the creation of a “Business Enterprise Zone” to complement the existing area at Colthrop, respectively.

- 7.5 Policies regarding the delivery of homes generated much discussion, particularly within the development industry. The ability of the LPR to consider and accommodate the needs of the wider housing market area within appropriate locations was stressed. The consideration of sites adjacent to settlement boundaries was again reinforced. At the same time it was also argued that policy should be seen in the context of relevant policies in the NPPF that protect areas and assets of particular importance. It was stressed that it was important that the LPR considers all options regarding existing housing site allocations and that it would need to have regard to whether they continue to remain deliverable and / or developable when assessed against up-to-date evidence.
- 7.6 The policy stance to support the delivery of affordable housing needs to be strengthened it was argued, to reflect the fact that this is one of WBC’s strategic priorities and to address housing need in general. One respondent strongly urged the Council to adopt the definitions of affordable housing in the revised NPPF, including starter homes and discounted market sales housing. It was also claimed that in order to reduce negotiations on viability, the Council may need to reduce its overall affordable housing requirement, prepare a more area based policy or reduce the costs arising from other policies.
- 7.7 Some respondents stressed that whilst the Council needs to consider the broad mix of homes that are required across the area (particularly with regard to an aging population) it was important that flexibility was retained with regard to the type of homes delivered on each site. Having a requirement to provide a fixed mix of housing types within a specific policy was questioned. It was also argued that the LPR should incorporate sufficient flexibility for the mix of dwellings sizes to be reflective of the surrounding environment and development pattern.
- 7.8 It was asserted that retail policies should be reviewed in light of the current challenges facing the high street. Future planning policy should allow for the development of a suitable mix of main town centre uses with higher density residential development within the town centre. The defined boundary of Newbury town centre in particular should continue to be afforded protection to ensure that out of town retailing does not harm or jeopardise investment within the town.
- 7.9 The Environment Agency provided some detailed comments and specific policy wording with regards to our approach to flood risk, specifically the sequential test, sequential approach and exception test, together with pollution prevention and water quality measures. It also noted that the LPR should include a specific water resources policy, together with another on watercourses. Thames Water also made detailed comments regarding water and wastewater infrastructure.

- 7.10 A comprehensive district-wide green infrastructure (GI) strategy was advocated in order to enable the most appropriate and efficient delivery of GI with new allocated development, and GI provision which best meets the needs of the District and the strategic objectives of the LPR. The overlap between this and a widening out of a policy on the Kennet and Avon Canal was also noted.
- 7.11 Whilst the inclusion of a specific policy covering cultural facilities was supported, it was also noted that this could also be achieved by way of a strategic policy promoting cultural facilities more generally under the umbrella of community facilities, the promotion of new cultural uses within town centre policy and ensuring robust protection of such facilities through an enhanced community, cultural and social facility policy.
- 7.12 One respondent argued the continued importance of maintaining separate policy provisions within the LPR for schools, colleges and residential institutions which lie partially or entirely within the open countryside.
- 7.13 Lastly, there was also support for the provision of specific policy protecting public houses, with the recommendation that the existing Supplementary Planning Guidance (SPG) is brought into Local Plan policy to give it greater weight.

Council response

- 7.14 Although this consultation related to our 'updated' assessment of policies it is acknowledged that some comments made previously in our Feb - March 2018 consultation were reiterated and reinforced using the revisions made to the NPPF.
- 7.15 We agree that the ability of the policies to incorporate flexibility will be important. There were offers of help to work together from a number of respondents on either individual policies, those relating to specific spatial areas and also relevant supporting documents and guidance which are welcomed. The additional technical information and guidance submitted will be particularly useful as the policies are reviewed further.
- 7.16 It is clear that as part of our assessment of policies some of the key tasks over the next few months will be:
- the inclusion of a strategic policy on climate change
 - the consideration of the revised affordable housing definitions and further consideration to different types of rural exception sites
 - further work on housing types and mixes, including appropriate pattern book densities and specialist housing such as older persons accommodation, custom and self-build and houseboats
 - to have regard to the existing housing site allocations and be further informed by our work on the Housing and Economic Land Availability

Assessment (HELAA) to help assess whether they continue to remain deliverable

- a review of the Protected Employment Areas (PEAs)
- a review of retail issues, including the hierarchy of centres and our approach to retail frontages
- consideration given to additional policies on water resources, pollution prevention and water quality
- consideration of our overall approach to the Kennet and Avon Canal and wider cultural and tourism issues

8. Other comments

Summary of comments received:

- 8.1 There were extensive comments made in response to the consultation generally, primarily relating to the Council's review of the housing requirement and the housing land supply. Some previously made comments in the Feb-March 2018 consultation were also updated in light of the revised NPPF.
- 8.2 The representations highlighted the continued importance of working strategically with our neighbouring authorities, specifically with regard to the provision of housing and in particular affordable housing and accommodation for Gypsies and Travellers and Travelling Showpeople, the strategic road network, the potential strategic development at Grazeley and the Thames Basin Heaths Special Protection Area (SPA). Statutory consultees also took the opportunity to reinforce the importance of identifying and mitigating any potential impacts on the strategic road network, rail infrastructure and the historic environment.
- 8.3 The length of the plan period was raised again. The Review will need to plan for at least 15 years from its adoption and is intended to cover the period to 2036. One respondent felt that consideration should be should be given to adopting a plan with a later end date in case the adoption date slipped. Another respondent questioned the timescale for the LPR, thinking it unlikely the Council would meet the timetable as set out in the current LDS.
- 8.4 There were a number of comments advocating both for and against the continued exploration of potential development at Grazeley. AWE in particular reiterated its previously expressed concern about major housing development close to AWE Burghfield. It was felt by some that the scale of development proposed at Grazeley would mean it was unlikely to come forward until 2036 and so to include a specific allocation within the Plan would conflict with the NPPF and make the LPR unsound.
- 8.5 Some in the development industry again took the opportunity to highlight the need for clarification around the approach the Council will take to housing in

rural areas, particularly the need to achieve a good mix of smaller sites and the need to identify opportunities for villages to grow and thrive.

- 8.6 Several respondents thought that insufficient attention had been paid to the economic needs of the area and stressed the importance of reflecting the wider strategies, investment priorities and infrastructure funding requirements of the Local Economic Partnership. It was argued there was also a requirement for the LPR to take account of any needs that may arise over the plan period from ‘predictable and known events’ such as the London overspill, planned infrastructure provision (e.g. Crossrail) and the expansion of Heathrow. It was agreed that it was crucial the employment land requirement was reviewed to look longer term and important it was translated into an appropriate ‘requirement’, with the figure adjusted on a policy basis (including allowing for a greater margin of choice/flexibility to the land demand forecast calculation, to ensure a reasonable choice of sites for businesses and developers and/or to allow for delays in sites coming forward or premises being developed) to determine the actual employment target for the District. It was also considered important to have an understanding as to how people would be working in the future. It was argued that the historic reliance upon “B-uses” may not be a sound approach for understanding future employment needs, where there may be a greater reliance upon technology, employment hubs, working from home and potentially less, or indeed different forms of space.
- 8.7 The focus of many comments was on the review of the housing requirement and the housing land supply. Those within the development industry stressed the importance of the Local Housing Needs (LHN) being seen as simply a minimum starting point and put forward arguments for the final housing requirement to be much higher. It was argued that it was evident that the Council’s housing requirement would be in excess of its need’s assessment given the unmet needs arising from Reading. It would also be important for the Council to consider how best to deliver the affordable housing need of the District on the basis of a realistic assessment of the viability of development within the area.
- 8.8 Having the housing requirement as a range was considered to be a pragmatic approach, but many felt that West Berkshire should be planning to meet the higher end of this range. Opinion was divided as to whether the AONB should be treated differently and whether or not it should be seen as a constraint. It was considered important that the requirement was underpinned by the Housing and Economic Land Availability Assessment (HELAA). A large number of respondents from the development industry took the opportunity to either submit new or resubmit existing sites under the HELAA.
- 8.9 The need to plan for a consistent delivery of homes across the plan period was emphasised, but the stepped trajectory proposed by the Council generated much discussion. There was a general feeling from those in the development industry that was no justification for this approach. It was argued that this would result in an insufficient supply of housing being planned for across the early part of the plan period and that such an approach could cause both affordability and supply issues generally. It was stated that the

LPR should not be over-reliant on housing delivery at fewer strategic development which take longer to come forward, but should incorporate a supply of small and medium-sites, as encouraged by the NPPF.

- 8.10 The housing land supply generated some comments. Some respondents in the development industry considered that the windfall allowance was too high. Others commented that any windfall allowance within the Council's trajectory would need to be fully justified through compelling evidence that demonstrated such sites would provide a reliable source of supply.
- 8.11 One respondent thought that we should include and allocate sites inside settlement boundaries rather than treat them as windfalls, particularly as many of those sites would be brownfield and specifically identified as priority for re-development within the NPPF.
- 8.12 There were some new sites submitted under the Housing and Economic Land Availability Assessment (HELAA) and others which were revised after having previously been submitted.

Council response:

- 8.13 The continued importance of working strategically with our neighbouring authorities is acknowledged and agreed. We are currently working with the other authorities in the Western Berkshire Housing Market Area in drafting a Statement of Common Ground which will cover these issues. As far as the timetable for the LPR is concerned, we are currently reviewing the Local Development Scheme (LDS).
- 8.14 The extensive comments primarily relating to the Council's review of the housing requirement and the housing land supply have been noted. The housing requirement and housing supply position will be reviewed during the course of preparation of the LPR, taking account of the latest evidence. The position at the time of consultation on the proposed submission plan will be set out in a supporting technical document. This will bring the evidence on housing need and housing land supply up to date and include an explanation of the proposed housing requirement and any allowances made in the supply for windfall development and for flexibility. It is encouraging to note that having the housing requirement as a range is considered to be a pragmatic approach, especially as the Local Housing Need (LHN) is variable up until the LPR is submitted to the Secretary of State for examination as the inputs are constantly changing. The concerns relating to any development proposed at Grazeley are again noted. The masterplanning work that has been undertaken will provide a detailed assessment of its potential that will be taken into consideration when sites are considered for development as part of the LPR.
- 8.15 The sites submitted under the Housing and Economic Land Availability Assessment (HELAA) and those sites which were revised after having previously been submitted will all be assessed. It is important to note that not all sites that are being promoted and which have been submitted as part of the HELAA will be appropriate for development. The HELAA will make a

preliminary assessment of the suitability and potential of those sites for new homes, employment and other land uses and will provide evidence of both strategic and non-strategic growth opportunities across the District. The Council is therefore not commenting on the suitability of the individual sites being promoted through the HELAA in its response to this Regulation 18 consultation in advance of the publication of the HELAA later in the year.

- 8.16 The HELAA is not a policy making document and so does not make recommendations on which sites should be developed, but the information we gather from the HELAA will inform how and where we allocate sites through the LPR to cover the period up to 2036.

9. Next steps

- 9.1 Following an analysis of the responses received we will:

- Finalise our Vision and Strategic Objectives
- Finalise the methodology for the settlement hierarchy and in co-operation with town and parish councils, start work on the audit of facilities and services
- Finalise the settlement boundary review criteria and in co-operation with town and parish councils, start work on the review of boundaries
- Start to undertake a detailed review of policies in co-operation with relevant stakeholders
- Publish a list of all sites that have been submitted to us for consideration under the HELAA
- Continue to update the evidence base to inform the LPR