



The Planning Inspectorate

Report to West Berkshire Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE WEST BERKSHIRE HOUSING SITE
ALLOCATIONS DEVELOPMENT PLAN DOCUMENT**

(PART OF THE WEST BERKSHIRE LOCAL PLAN)

Document submitted for examination on 6th April 2016

Examination hearings held between 21st June 2016 and 14th July 2016

File Ref: PINS/W0340/429/6

Abbreviations Used in this Report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
CA	Conservation Area
CS	West Berkshire Core Strategy Development Plan Document
DPD	Development Plan Document
Dph	Dwellings per hectare
EA	Eastern Area
ha	Hectare
HSADPD	West Berkshire Housing Site Allocations Development Plan Document
LDS	Local Development Scheme
MM	Main Modification
NP	Neighbourhood Plan
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
WBLP	West Berkshire Local Plan (currently in course of preparation)

The references in the foot-notes are to documents that can be found in the Examination library.

The references to 'Site Plan' refer to the plans that accompany the allocation policies within the HSADPD itself.

Non-Technical Summary

This report concludes that the West Berkshire Housing Site Allocations Development Plan (HSADPD) provides an appropriate basis for the planning of the area, providing a number of modifications are made to the plan. West Berkshire Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All the modifications were proposed by the Council and were subject to public consultation and I have recommended their inclusion after considering the representations on them from other parties.

The Main Modifications can be summarised as follows:

- the clarification of the role of the DPD, its relationship to the adopted Core Strategy, the Policies Map, Neighbourhood Plans, and the forthcoming 'new' Local Plan;
- the amendment of the developable area in relation to several of the allocated housing sites (in the interests of accuracy);
- an increase in the housing allocations at HSA 12 (Calcot) and HSA 15 (Theale);
- the deletion of policy HSA 14 (North Lakeside, Theale);
- the deletion of policy TS 3 – Clappers Farm Area of Search;
- the clarification of access and footway arrangements in relation to a number of allocations;
- the requirement for the provision of sewerage, water supply and drainage infrastructure in relation to a number of allocations;
- the identification of the area referred to in policy HSA 18 (Woolhampton) as being retained for wildlife habitat/open space;
- confirmation of the Council's approach to the review of settlement boundaries and limited infill in countryside settlements with no boundary;
- clarification of the Council's parking requirements in policy P 1; and
- the inclusion of references in a number of policies to landscape mitigation measures; the protection of heritage assets; and the provision of arboricultural and ecological surveys.

Introduction

1. This report contains my assessment of the West Berkshire Housing Site Allocations Development Plan Document (HSADPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Proposed Submission Plan dated November 2015.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any main modifications (MM) needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. This Report explains why the recommended MMs, all of which relate to matters that were discussed at the Examination hearings, are necessary. These main modifications, referenced in bold in the report (**MM**) are set out in full in the Appendix. For the avoidance of doubt there is no MM4 because circumstances have changed since the MMs were published (see paragraph 41).
4. Following the hearings, the Council prepared a schedule of the proposed MMs and carried out a sustainability appraisal (SA) of them. The schedule and SA have been subject to public consultation for over six weeks and I have taken into account the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted plan. In this case the submissions policy map comprises the plans as set out throughout the submitted document.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications do require corresponding changes to be made to the policies map and I am satisfied that any such changes have been subject to appropriate public consultation. In the interests of completeness I have attached to the Appendix the changes to the Site Plans that are included within the HSADPD itself. When the HSADPD is adopted, in order to comply with the legislation and give effect to the Plan's

policies, the Council will need to update the adopted policies map to include, where appropriate, all the changes now proposed.

Preliminary Matters

The Consideration of Alternative Sites for Housing

7. To accord with paragraph 182 of the NPPF and in the interests of brevity, the focus of this Report is on the soundness of the submitted Plan rather than on individual objections. Consequently it is only necessary for me to refer to alternative sites for housing allocations (omission sites) in circumstances where there is sufficient cause to justify comparing the soundness of the Council's proposals with other options that may be available (i.e. where there is sufficient doubt that the most sustainable and appropriate strategy is being followed by the Council).

Current and Recent Planning Applications

8. A number of allocated and non-allocated housing sites have been granted planning permission during the course of the Examination (or are currently being considered by the Council). It is not appropriate for me to comment on detailed proposals and for the avoidance of doubt I do not refer to all of them in this Report.

Developable Areas

9. There were a significant number of inaccuracies in terms of the size of the developable areas as identified in the allocation policies. The Council has re-assessed the hectarages referred to¹ and is proposing to include a definition of 'developable area' in the Glossary. For the avoidance of doubt the changes to the site areas are included in this Report as Main Modifications. It should be recorded that there are no changes to the number of dwellings proposed on these sites, except where there is a specific MM to that effect.
10. It is the Council's objective (CS Strategic Objective 2) to ensure that land is 'developed at densities which make the most efficient use of land whilst responding to the existing built environment' and there is no reason to conclude that there is insufficient flexibility in the allocation policies to enable that objective to be achieved (for example by the use of the word 'approximately').

Settlement Boundaries

11. Issues were raised by some representors regarding the delineation of the settlement boundaries. Only the boundaries of settlements within the settlement hierarchy have been reviewed and the Council has used an appropriate list of criteria (HSADPD Appendix 6) on which to base the review.
12. A particular issue arose with regard to the settlement boundary at Firlands Farm, Burghfield Common – a site that has outline planning permission for residential development but which is outside the settlement boundary. It was

¹ Ref: PS/04/05/58

suggested that the site should be included within an amended settlement boundary and/or referred to in the text of the Plan. At my request the Council reconsidered the matter (Ref: PS/04/05/25) but concluded that a reference to this site in the Plan or an amended settlement boundary was not necessary.

13. The principle of development on the site has been established through the granting of planning permission and therefore I do not consider the issue to be one of soundness. The Council did suggest a potential addition to the supporting text but any such amendment would be minor in nature and it would therefore be up to the Council to decide whether or not to include it in the HSADPD.
14. The inclusion of the allocated sites within the settlement boundary is logical and I note that the Council is proposing to review all the boundaries again in the West Berkshire Local Plan (WBLP), on which work has already started (estimated adoption in 2019). In order to clarify the situation the Council is proposing to include further explanatory text on the matter and I agree that this is required in order to demonstrate that the most appropriate strategy (with regard to settlement boundaries) is being proposed. **MM2** is therefore recommended. Unless referred to elsewhere in this Report I am satisfied that the Council's overall approach to the settlement boundary review is sound.

Public Consultation

15. A number of interested parties expressed dis-satisfaction with the public consultation on the HSADPD that was undertaken by the Council. However, the Statement of Consultation (and associated Appendices)² clearly sets out who has been consulted; at what stage in the process; and what the broad outcomes of the consultation were.
16. It is clear that the Council is fully aware of the views of local residents and others and that these have been given due consideration. The requirements of the Council's Statement of Community Involvement³ have been met and the statutory consultation has been undertaken in accordance with the relevant Regulations.

Assessment of Duty to Co-operate

17. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
18. The Council's Duty to Co-operate Statement⁴ (April 2016) sets out the strategic planning issues and priorities (including housing needs and housing growth); identifies the relevant bodies that have been involved; summarises the actions and outcomes stemming from the strategic working; and includes a Memorandum of Understanding between the Berkshire Unitary Authorities on strategic planning and the duty to co-operate. It also indicates how on-going co-operation will be ensured. Bearing in mind the function of the HSADPD, as

² Ref: CD/01/07

³ Ref: CD/01/12

⁴ Ref: CD/01/09

a daughter document to the adopted Core Strategy (CS), I am satisfied that the relevant cross-boundary strategic matters have been appropriately addressed. No evidence was submitted to demonstrate that co-operation has not occurred and it can be concluded that the Council has engaged constructively, actively and on an on-going basis and that the duty to co-operate has been met.

Assessment of Soundness

Preamble: The Role of the Site Allocations Development Plan Document

19. A number of concerns were raised by respondents regarding the function of the HSADPD; the relationship between the HSADPD and the adopted CS; and the weight to be attached to the recently published 'Berkshire (including South Bucks) Strategic Housing Market Assessment' (February 2016)⁵.
20. The Council's intention is that the HSADPD should be the document that takes forward in more detail the policies and proposals that are embedded in the adopted CS. This is an appropriate approach to take and there is no requirement, as part of this Examination, to reconsider the housing need and provision that is set out in the CS. That said, a number of concerns were raised regarding the delivery of, in particular, the Sandford Strategic Site Allocation (policy CS 3 of the CS) and the consequence that this may have in terms of housing supply. I address this matter in paragraph 33.
21. Neighbourhood Plans (NP) are important tools that enable local communities to deliver the sustainable development that they need in a way that they can support. There is currently no reference to the role that NPs can play in contributing to meeting the needs of West Berkshire. In order to ensure the HSADPD is positively prepared and consistent with national policy it is recommended that text is included in the Plan with regard to the role of NPs (**MM3**).
22. I am satisfied that the function of the HSADPD and its relationship to other Council planning documents (including the forthcoming WBLP which is referred to in Appendix 1 of the Plan) is sufficiently clear.

Main Issues

23. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified ten main issues upon which the soundness of the Plan depends.

Issue 1 – Whether or not the Council's broad approach to delivering sustainable housing development, including overall housing numbers and the requirements of policy GS 1, are justified

The Council's Broad Approach, the Spatial Strategy and Overall Housing Numbers

⁵ Ref: CD/02/01

24. As referred to above, the role of the HSADPD, as a daughter document to the CS, is clear. The CS establishes the overall housing requirement and this is distributed between the four spatial areas as set out in the CS. The HSADPD allocates the sites that are required to accommodate the proposed growth.
25. Appendix 4 of the Council's Statement for Issue 1 clearly sets out the housing requirement and proposed supply. Only in the Eastern Area (EA) is the housing requirement not likely to be met but this is partly addressed through the 'over-provision' of housing elsewhere in West Berkshire. There are three fundamental reasons given by the Council for the 'under-supply' in the EA – namely the proximity of the North Wessex Downs Area of Outstanding Natural Beauty (AONB); flood risk; and highway capacity. Further justification for the Council's approach, to which I have attached weight, is given in PS/04/05/08 (as revised).
26. I share the Council's concerns regarding the need to conserve the landscape and scenic beauty of the AONB and to avoid inappropriate development in areas at risk of flooding. The Council's approach to these matters is in accordance with national advice. With regard to highway capacity the evidence is less persuasive, especially as capacity improvements in the area have recently been undertaken or are proposed. The Council, however, considers it prudent to await the outcome of traffic surveys following the opening of the Ikea store at Calcot in July 2016.
27. I understand the Council's position regarding the need for up-to-date evidence and it is clear to me that the traffic implications of development in the EA are of significant concern to many local residents. On that basis, and taking into account the proposed housing provision in the District as a whole (which significantly exceeds the overall CS requirement), I consider the Council's cautious approach in the Eastern Area at this time to be reasonable, especially as it is a matter that will need to be addressed as part of the preparation for the forthcoming WBLP. In reaching this conclusion I have attached weight to the fact that the Council is proposing to increase housing numbers for some sites in the EA and that there is evidence that other additional housing development may come forward which would further reduce the deficit⁶ in this spatial area.
28. With regard to housing provision in the AONB it is clear that the Inspector who examined the CS concluded that there should be a cap of 2,000 new dwellings in the AONB for the period 2006-2026. In terms of housing numbers the Council's Note on Housing Development within the AONB (PS/02/16) confirms that in the AONB, as at March 2016, 1,230 dwellings had been completed, 200 units had planning permission, and a further 385 dwellings are allocated – a total of 1,815.
29. The Council has undertaken further sensitivity testing with regard to the windfall allowance and if the trend of the last five years is projected forward, this would lead to a windfall allowance of 193 dwellings (for the period 2016 – 2026). This would give a total of 2,008 dwellings (it should be noted that no allowance has been made for permissions lapsing). Bearing in mind the restrictive policies that apply to the AONB and the diminishing likelihood that

⁶ Ref: PS/04/05/08 as revised; PS/04/05/18 and PS/04/05/19

major development in the AONB would be in the public interest, then I am satisfied that the Council's approach to allocating housing in the AONB is justified.

30. On the evidence submitted it can be concluded that there is a need for housing in the AONB (which covers almost 75% of the District); that in terms of sustainability, Hungerford is an appropriate settlement to accommodate much of that need; and that the Council's landscape-led approach to identifying potential housing sites in the AONB (as summarised in PS/04/05/10) is justified.
31. As already referred to, it is currently estimated by the Council that about 2,008 dwellings will come forward in the AONB, a number that is broadly compatible with the CS figure. Bearing in mind it is currently estimated that the WBLP (which will re-assess housing need and distribution) will be adopted by November 2019⁷, I consider this is a pragmatic and reasonable route to follow because the Council will shortly have the opportunity to reconsider its approach to sustainable development in the AONB in the light of the current housing evidence at that time. I am satisfied that the very small 'over-provision' of housing in the AONB is not of such significance that it threatens the overall soundness of the HSADPD.
32. In order that the HSADPD reflects the most up-to-date position, the Council proposes to modify the section of the document entitled 'Approach to housing numbers' and Appendix 1 which includes housing land supply figures and two trajectories. It is proposed to take a consistent approach to the windfall allowance (i.e. the figures for the AONB and for the remainder of the District are now both for five years). Bearing in mind the anticipated completion of the WBLP in 2019, I am satisfied that the Council's approach is justified. Even if work on the new local plan is delayed (and there is no reason to conclude that this is likely) then the Council's monitoring process would identify any issues that may need to be addressed to ensure that the appropriate provision of housing (and other land uses) is satisfactorily secured. The provision of a single trajectory relating to the CS housing requirement is justified in the interests of clarity and **MM1** is therefore recommended.
33. Turning briefly to the situation with regard to the strategic site allocation at Sandlesford Park (CS policy CS 3). It is correct that progress on bringing the site forward has been slower than originally anticipated. Nevertheless the Council is clearly in continuing discussions with the developers and agents and has undertaken its own work to help secure delivery (for example in relation to highway improvements). A deadline of November 2017 has been agreed for the completion of further work in support of the proposal and the Council is confident that a resolution to the outstanding issues will be achieved. There is no reason to doubt that a satisfactory outcome will be forthcoming but even if it is not, it will be the role of the WBLP to address any outstanding issues of housing need and supply at that time, based on the most up-to-date evidence.

Terminology Used

34. A number of the allocations refer to 'the developable area' but the extent of

⁷ Local Development Scheme (October 2015)

such areas is not always clear. Similarly the definition of the terms 'landscape buffer', 'masterplan', and 'parking zones' (which are used in a number of policies) are not sufficiently clear. Consequently, in order to ensure effectiveness, it is proposed to include a definition of the aforementioned phrases in the Glossary and these changes are recommended in **MM53, MM54, MM55** and **MM56**. Some concerns were raised regarding the definitions proposed by the Council but I am satisfied that none of the wording threatens the soundness of the HSADPD. It is clear that these are broad definitions that are required for guidance and that they do not form part of any policy.

The Requirements of Policy GS 1

35. Policy GS 1 is the General Site Policy which establishes the information and requirements that will be expected to accompany a planning application for an allocated site. Concerns were expressed regarding the expectation that a single planning application (outline or full) would be submitted for each allocated site. However, this would encourage a comprehensive approach to be taken and ensure the timely provision of infrastructure. It is right that the Council should seek appropriate ways to achieve the satisfactory delivery of the allocated sites and the reference to this objective in the policy ensures that it will be effective.

Conclusion on Issue 1

36. Bearing in mind that work on the review of the WBLP has already commenced, I am satisfied that the Council's broad approach (as modified) to delivering sustainable housing development is justified and accords sufficiently with the framework provided by the adopted CS.

Issue 2 – The appropriateness of the site selection process

The Site Selection Process

37. Concerns were raised regarding the approach to site selection taken by the Council and in particular with regard to the consideration of reasonable alternatives. However, the Background Paper (reference CD/02/03) includes a section entitled 'Approach to the Housing Allocations DPD' and it sets out the Council's approach to the delivery of housing. In particular Appendix B summarises the site selection process.

38. A more rigorous assessment of potential development sites is included within the Sustainability Appraisal/Strategic Environmental Assessment (CD/01/03 and CD/01/04). This was evolving 'evidence' which was discussed with relevant technical experts, Town and Parish Councils and other interested parties as appropriate. Public consultation has been a key component of the process.

Conclusion on Issue 2

39. It must be remembered that this DPD is not starting afresh in terms of

housing numbers or the broad locations for development but that its function is to put flesh on the bones provided by the CS. On that basis I am satisfied that the Council has adopted a proportionate, inclusive, sufficiently detailed and justified approach to the selection of sites and that it is sound.

Issue 3 – Whether or not the allocation policies for the Newbury and Thatcham Spatial Area are justified

Newbury (HSA 1 to HSA 4)

40. Newbury is the focus for substantial residential growth over the coming years and the CS allocates two strategic sites at Newbury Racecourse and Sandleford for a total of about 3,500 dwellings. Against this background a further 4 sites are allocated in the HSADPD.
41. The requirements of policy HSA 1, land north of Newbury College, will ensure that the development of the site will be undertaken in a sustainable way. The Council initially proposed that the draft policy should be amended to refer to 'approximately 0.7ha'. However, having considered the consultation responses to the proposed MMs, it is clear that this change is not justified and that the developable area should continue to be described as approximately 0.5ha.
42. With regard to land at Bath Road, Speen (HSA 2), in the interests of accuracy (and hence justification), the policy should refer to 'approximately 4.8ha' (**MM5**). Particular concerns were raised by local residents regarding access and highway safety. Having re-assessed the evidence, particularly with regard to landscaping and access, the Council is proposing to make changes to the Site Plan that will satisfactorily reflect the up-dated situation. In any event policy HSA 2 requires issues of access and planting to be addressed at the planning application stage. It is also proposed to amend the text of the policy to refer to the need to fully consider the heritage setting of the site and to afford protection to the Speen conservation area. These are justified requirements and are recommended accordingly (**MM6**).
43. Similarly highway safety concerns were raised in relation to land at Coley Farm, Stoney Lane (HSA 3) and photographic evidence was submitted to demonstrate problems that have occurred. However, the policy specifically refers to the widening of Stoney Lane and the provision of footpaths and the Council's highways witness confirmed that although there will be an increase in vehicle movements, current traffic levels are comparatively low. No compelling evidence was submitted that would lead me to conclude that, subject to the provision of appropriate mitigation measures, the development of this site (and indeed cumulatively with other nearby sites) would lead to a significant risk to highway safety. In order to be effective it is recommended that the policy refers to 'approximately 3.3ha' (**MM7**).
44. In terms of assimilating the development into this part of Newbury, the policy requires sensitive design and it is proposed to add a further requirement regarding the provision of landscape mitigation measures. This reflects the most appropriate strategy to follow and therefore **MM8** is recommended.

45. Policy HSA 4 allocates development on four sites off Greenham Road and New Road. The allocation includes significant areas of open space and landscape buffer and concerns were raised by local residents regarding the safeguarding of the open space. In response to those concerns and following the hearing session, the Council and landowner have prepared a Statement of Common Ground (Ref: PS/04/05/51) which satisfactorily summarises how the open space will be managed and safeguarded. The policy should refer to 'approximately 7.7ha' and in the interests of effectiveness this is recommended (**MM9**). The policy includes a number of requirements, for example in relation to ecological matters, contamination and transport, which will contribute to ensuring that a satisfactory development will be achieved.
46. Reference is made in the Plan to the London Road Industrial Estate – Area of Regeneration. In the medium to longer term there may be potential to redevelop this area, including the opportunity to include residential development. However, I agree with the Council that currently there is insufficient certainty regarding the future role of the locality and the delivery of any redevelopment. Until such time as the Council's aspirations for the industrial estate become clearer it would be inappropriate to include a policy or identify the site as an allocation because there is the risk that delivery could not be secured. The inclusion of the textual reference, however, is appropriate as it provides an indication of the Council's longer-term intentions.

Thatcham (HSA 5)

47. Thatcham has accommodated a comparatively high level of growth in recent years and the Council is keen to ensure that the town has satisfactorily assimilated this growth before consideration is given to whether or not there is any potential for further strategic level development which could deliver improved infrastructure.
48. This is a pragmatic approach which accords with the vision for the town as set out in the CS and which does not have negative consequences in terms of the overall level of housing provision in the Newbury and Thatcham Spatial Area. It is made clear that the role of Thatcham will be considered in the forthcoming WBLP.
49. The one site that is allocated in the town, at Lower Way (HSA 5), has elicited objections from a number of local residents. In particular there are concerns regarding access, highway safety, flood risk and ecological and landscape impact. However, the policy makes it clear that a Landscape and Visual Impact Assessment, extended Phase 1 habitats survey, Habitat Regulations Assessment and a Flood Risk Assessment will all have to accompany any planning application. In terms of vehicular movements the Council confirmed that, if required, appropriate mitigation measures could be implemented but that there was no substantive evidence that development of the site would result in a significant risk to highway safety. In the interests of protecting ecological sites of European importance and ensuring that the most appropriate strategy is followed, it is recommended (in **MM10**) that the policy should require the connection of the development to the mains sewerage system and that an integrated water supply and drainage strategy should also be required.

Cold Ash (HSA 6 and HSA 7)

50. Cold Ash is designated a Service Village where some limited development would be appropriate. The site at Poplar Farm (HSA 6) could accommodate between 10 and 20 dwellings. The Farmhouse is a listed building and in order to ensure consistency with national policy it is recommended in **MM11** that it is a requirement of the policy that development would ensure the conservation and enhancement of the listed building and its setting. For effectiveness it is also recommended that the policy refers to 'approximately 1.1ha' (**MM12**).
51. The allocation at St Gabriel's Farm (HSA 7) is for 5 dwellings in the form of frontage development to reflect the settlement pattern in the locality. It is important to seek the provision of appropriate safe pedestrian links from the site to nearby facilities and to this end it was initially proposed to include the provision of a footway across the frontage of the site. However, following consultation on the MMs, it is clear that this cannot be achieved without significant harm to the hedgerow (or compromising highway safety). The Council is therefore proposing to support a footway link (see Minor Change PMC40) but not to require that it is routed across the frontage of the site. In order to ensure that the most appropriate strategy is proposed, **MM13**, in its up-dated form, is therefore recommended.
52. The policies for the two allocations at Cold Ash include requirements, for example, relating to flood risk, access and planting and there is no reason to doubt that satisfactory development of the sites can be achieved.

Conclusion on Issue 3

53. The Council has provided adequate justification for the allocations at Newbury and Thatcham and taking into account the proposed modifications, the policies are sound.

Issue 4 – Whether or not the allocation policies for the Eastern Area are justified

Overview

54. Concerns regarding, for example access, highway safety, flood risk, planting, ecology and infrastructure capacity were raised regarding the allocations in the EA. However, the relevant policies include requirements relating to the satisfactory resolution of any problems associated with such issues. Whilst I understand the concerns of residents there is no reason to conclude that the Council will not address such detailed matters at the appropriate time.

Tilehurst (HSA8 to HSA10)

55. Three sites are allocated for housing in Tilehurst. In order to introduce appropriate flexibility into the proposal for the land to the east of Sulham Hill (HSA 8), the option of providing an alternative access off Sulham Hill should be referred to in the policy. **MM14** is therefore recommended. For

effectiveness the policy should refer to 'approximately 1.2ha' and this is recommended accordingly (**MM15**).

56. The other two allocations are at Stonehams Farm (HSA 9 and HSA 10) and to be effective the supporting text should be amended to refer to 'developable areas of 0.7 ha and 2.5ha' in respect of the two sites (**MM16**).

Purley-on-Thames (HSA 11)

57. The site at Purley Rise is relatively close to a number of facilities and services. The proposed landscape buffer would contribute to ensuring that the development would sit comfortably in its setting and would not cause undue harm to the character and appearance of the AONB. To be effective it is recommended that the policy refers to 'approximately 1ha' (**MM17**).

Calcot (HSA 12 and HSA 13)

58. It is important to ensure that the optimum use is made of allocated sites (taking into account any potential constraints to development). The allocation on land adjacent to junction 12 of the M4 (HSA 12) includes a large area of open space/landscape buffer. Having re-assessed the justification for the size of the open space/landscape buffer, the Council has concluded that the developable area should be increased to approximately 4ha (from 1.7ha) and that the number of dwellings should increase from 100 to between 150 and 200. This approach is sound. Among the concerns raised by the Parish Council is the issue of air quality but, together with the issue of noise, I am satisfied that the requirements of the policy will ensure that this increase in capacity will not have any significant adverse impacts. Noise from the motorway can be mitigated through good design and the use of appropriate materials and it is proposed to make explicit reference in the policy to the need for good acoustic design. On this basis I recommend **MM18**.
59. On the opposite side of Dorking Way to the HSA 12 site lies the other allocation in Calcot (HSA 13). I saw that the adjacent Bath Road is a key route into Reading and it is therefore appropriate to include in policy HSA 13 a requirement for good acoustic design. This will ensure consistency between the two adjacent allocations and is recommended accordingly (**MM19**). In the interests of consistency and effectiveness it is also recommended that the policy includes 'approximately' before 1ha (**MM20**).

Theale (HSA 14 and HSA 15)

60. Only limited development is proposed in Theale because, as the CS confirms, if development goes ahead at Lakeside, the settlement would need to undergo a period of consolidation. However, there is currently some uncertainty regarding the viability and delivery of 350 dwellings at Lakeside, as allocated in policy HSA 14 (although there is an extant planning permission on the southern part of the site). Nevertheless the Council is keen to support the principle of sustainable development on this site and is therefore proposing that the allocation be deleted but that the site is retained within the settlement boundary. There will therefore be a presumption in favour of appropriate sustainable development on the site. This approach will indicate the broad support of the Council, subject to the resolution of a number of

matters for example in relation to access and impact on the adjacent AONB, but at the same time will provide a level of flexibility which should enable all parties to agree a satisfactory conclusion.

61. In order to clarify and up-date the Council's intentions towards the development of land at Lakeside, it is proposed to delete the allocation (policy HSA 14) and amend the supporting text. On the basis of the evidence before me I agree that the Council's approach is sound and recommend that policy HSA 14 is deleted (**MM21**). Depending on the progress made, there is the imminent opportunity for the reconsideration of the site as part of the WBLP process.
62. The Site Plan that accompanies policy HSA 15 (land between the A340 and The Green) identifies a very significant landscape buffer. Having reconsidered the site the Council has concluded that the extent of the buffer could be reduced. I agree that it is important that the setting of the adjoining AONB is protected and that any development is assimilated well into the existing (and proposed) built form of Theale. However, I am satisfied that this can be achieved in a sustainable way on a slightly larger developable area and therefore I agree that the developable area of the site should be enlarged to approximately 3.4ha (from 2.3ha) and that the number of dwellings should be increased from 70 to approximately 100. **MM22** is recommended accordingly.

Conclusion on Issue 4

63. It is important that optimum use is made of allocated sites, provided any constraints to development are afforded appropriate weight. Therefore the re-assessment of the two allocations HSA 12 and HSA 15 is justified. On this basis the policies for the EA (as modified) are sound.

Issue 5 - Whether or not the allocation policies for the East Kennet Valley Spatial Area are justified

Burghfield Common (HSA 16 and HSA 17)

64. Burghfield Common is a relatively sustainable Rural Service Centre which includes a number of facilities and services dispersed throughout the settlement. The site on land adjoining Pondhouse Farm (HSA 16) includes the provision of a landscape buffer which would afford protection to the nearby ancient woodland. The policy stipulates that detailed issues of (for example) flood risk, planting, layout and accessibility would all have to be addressed. Concerns were expressed regarding the impact of development on the viability of the farm business but no substantive evidence was submitted to demonstrate that such concerns should outweigh the benefits of allocating this site for sustainable development. To be effective the policy should refer to 'approximately 4.8ha' and this is recommended accordingly (**MM23**).
65. The land to the rear of The Hollies Nursing Home (HSA 17) is slightly more constrained than HSA 16 because of the existing woodland on the site which should be retained. Nevertheless satisfactory vehicular and pedestrian access can be achieved and in any event it is a requirement that the site is master-

planned comprehensively, thus ensuring that a satisfactory development will be delivered. For reasons of effectiveness it is recommended in **MM24** that the policy refers to 'approximately 2.7ha'.

66. The site is in a number of ownerships and it was suggested that this could hamper delivery. However, a Statement of Collaboration⁸ was submitted which confirms that there are currently no known impediments to delivering the whole site.
67. The issue of Firlands Farm is addressed in paragraph 12.

Mortimer

68. There are no allocations within the HSADPD for Mortimer. The Council is relying on the Stratfield Mortimer NP to deliver sustainable development in the settlement (about 110 dwellings). However, the Examiner's Report (October 2016) recommended that the proposal for the NP be refused. The Parish Council has requested a delay in the consideration of the Report until May 2017, so that it can respond to the issues raised by the Examiner.
69. Paragraph 2.40 of the HSADPD confirms that if satisfactory progress has not been made within two years of the adoption of this Plan, then the District Council will identify opportunities to ensure that the housing requirement will be met. The promoter of the site proposed for allocation has been involved in the process from the start and there is no substantive evidence that would lead me to conclude that housing will not be delivered in Mortimer. However, it is a matter that should be closely monitored and if necessary reconsidered as part of the WBLP preparation. The Council's approach is currently consistent with national policy and is sound.

Woolhampton (HSA 18)

70. Woolhampton is a Service Village which could accommodate a limited amount of development. The allocated site to the north of the A4 is close to facilities and services; can be satisfactorily accessed; and would be capable of integrating well into the built form of the existing settlement. To ensure effectiveness it is recommended that the reference in the policy is modified to read 'approximately 1.2ha' (**MM25**). The policy refers to the retention of land to the north as 'wildlife habitat/open space' and in order to ensure that the most appropriate strategy will be followed, the Council is proposing to identify this land on the Site Plan.

Aldermaston

71. Policy CS 8 of the CS confirms that in the interests of public safety residential development within 3km of AWE Aldermaston is likely to be refused. Consequently no housing development is proposed at Aldermaston and such an approach is justified and in all other respects sound.

⁸ Ref: PS/05/HW/24b

Conclusion on Issue 5

72. The Council's policies for the East Kennet Valley Spatial Area, as modified, are sound.

Issue 6 - Whether or not the allocation policies for the North Wessex Downs AONB Spatial Area are justified

Hungerford (HSA 19)

73. Hungerford sits within the AONB and I have attached great weight to the need to conserve the character and appearance of the AONB and to the fact that major development should be refused unless there are exceptional circumstances and the development can be demonstrated to be in the public interest. To this end I have questioned the Council on a number of occasions with regard to its approach to development in the town and the wider AONB.
74. The framework is provided by the adopted CS and in particular Area Delivery Plan Policy 5. This confirms that there will be appropriate and sustainable growth in the AONB and that new housing allocations will be focussed on the Rural Service Centres (e.g. Hungerford) and Service Villages. The policy makes provision for up to 2,000 dwellings in the AONB (see also paragraphs 28-31). The emphasis will be on meeting local needs and it is clear that it will be the role of this Plan to allocate development depending on the role and function of the settlement and taking into account the Strategic Housing Land Availability Assessment (SHLAA). The policy states that 'development will be focussed in Hungerford as the more sustainable Rural Service Centre'. Hungerford town centre is one of only two defined town centres in the District and I saw that it is a sustainable settlement which enjoys a wide range of facilities and services.
75. The principle of development in Hungerford is therefore established and the issue then becomes whether or not the Council's allocation on land to the east of Salisbury Road is sound and in particular whether or not such development would adequately respect the need to conserve the landscape and scenic beauty of the area.
76. The allocated site for about 100 dwellings (HSA 19) lies to the south of the town on relatively elevated but predominantly flat land. Access is proposed off Salisbury Road, which is the main entrance to Hungerford from the south. A public footpath runs from north to south across the site and I saw that some significant screening around the site already exists.
77. Although it is not a level route to the town centre, the development would be within a relatively comfortable walking distance for many and the site is very close to the secondary school and leisure facilities. The SHLAA confirms that the potential impact on the appearance of the landscape would be the primary consideration. This factor is also reflected in the Sustainability Appraisal which concludes that the northern part of the site (HUN007) should be allocated and that little harm would be caused to the AONB subject to the implementation of appropriate mitigation measures.

78. I have considered all the evidence regarding the visual implications of developing the site (including the objection to the allocation from the North Wessex Downs AONB team) and I have visited the area on a number of occasions. The Hungerford Landscape Sensitivity Study⁹ concludes that the land to the south of the town is of medium sensitivity and I note that there are no areas of low or low to medium sensitivity identified around the settlement. The Landscape Capacity/Sensitivity Assessment confirms that development on the whole site (as identified in the SHLAA for 188 dwellings) would result in significant harm to the AONB but concludes that development on a smaller area (as is currently proposed for 100 dwellings) would be acceptable subject to the implementation of appropriate mitigation measures. Indeed it is suggested that the development may be beneficial in terms of 'softening' the southern edge of the town. The policy includes requirements for a woodland buffer, enhancements to the 'entrance' to Hungerford, the retention of views through the site and the retention of existing tree cover. A full Landscape and Visual Impact Assessment has been prepared on behalf of the developer and this concludes that, with the implementation of appropriate mitigation measures, the development of the site would be acceptable in both landscape and visual terms.
79. The AONB team suggests that the most sensitive part of the site sits adjacent to Salisbury Road and expresses concern regarding the visual impact of the potential roundabout access to the site. I understand those concerns but they are largely matters to be addressed at the planning application stage and the Council would be expected to determine any application in the light of the adopted CS policies, in particular policy CS 19 (Historic Environment and Landscape Character) and CS 14 (Design Principles). With appropriate planting, layout and design there is no reason to conclude that any harm caused would be of such significance to the landscape and scenic beauty of the AONB that it would outweigh the need for Hungerford to accommodate an appropriate level of growth for such a sustainable settlement.
80. It is clear to me that the Council is fully aware of the need to respect the character and appearance of the AONB and bearing in mind the requirements of the adopted CS and the other factors summarised above, the circumstances exist to justify the proposed allocation and it is in the public interest to support efforts to contribute towards meeting the housing needs of the town.
81. I therefore conclude that the allocation and requirements of policy HSA 19 are sound. I am therefore not required to consider alternative sites in Hungerford that have been proposed, suffice it to say that many of them display similar or worse consequences with regard to the character of the AONB, none of them alone would be able to accommodate a similar number of dwellings and some are further away from key facilities and services. Concerns were expressed regarding the implications of traffic from the site travelling through the town centre to reach the A4 but there was no conclusive evidence to demonstrate that any harm caused would be of such significance to justify an 'embargo' on development to the south of the town. I have considered the potential for brownfield sites to make a greater contribution to housing provision but there is insufficient robust evidence to enable me to conclude that such sites could be satisfactorily developed or accommodate an appropriate number of

⁹ Ref: Part of CD/03/06

dwellings, bearing in mind the housing need.

82. In the interests of consistency and in order to ensure effectiveness the policy should refer to 'approximately 5.7ha'. **MM26** is therefore recommended.
83. The Council is keen to secure the provision of allotments on the site to help meet local need. Some representors questioned the suitability of the soil for allotments but no substantive evidence was submitted to demonstrate that they could not successfully be provided. On that basis this appears to be an appropriate requirement for consideration and therefore I recommend an additional bullet point in the policy requiring the provision of permanent allotments to be explored (**MM27**).

Lambourn (HSA 20 and HSA 21)

84. Lambourn lies within the AONB and is a Rural Service Centre which, although it has fewer facilities and services than Hungerford, nevertheless performs an important role in terms of service provision, particularly with regard to the equestrian industry. Two sites are allocated for housing.
85. Land adjoining Lynch Lane (HSA 20) lies at the edge of the village but I agree with the North Wessex Downs AONB team that development of this land, which would include a landscape buffer around the perimeter of the site, would not detract significantly from the character and appearance of the locality.
86. The policy refers to access off Lynch Lane, The Park and/or Essex Place. However, doubts were cast over the deliverability of the latter two accesses because of land ownership issues. In any event the Council has confirmed that satisfactory access to the site can be achieved solely off Lynch Lane. It is also proposed that there should be a reference in the policy to providing appropriate pedestrian and cycle routes from the site. These changes to the policy are justified in the interests of sustainability and to ensure that the most appropriate strategy is proposed and they are recommended accordingly (**MM28**). In order to protect nearby sites of European ecological importance the Council is proposing to include a requirement that the site is connected to the mains sewerage system. In these circumstances this is the most appropriate strategy to follow and therefore **MM29** is recommended. For reasons of effectiveness it is recommended that the policy refers to 'approximately 4.5ha' (**MM30**).
87. Similar circumstances apply to the other allocation in Lambourn and it is recommended that policy HSA 21 also includes a requirement for a connection to be made to the mains sewerage system, that an integrated water supply and drainage strategy becomes a specific requirement of the policy, and that it is made clear that appropriate consideration should be given to matters of ecological importance (**MM31**). The policy should refer to 'approximately 0.8ha' and **MM32** is therefore recommended.
88. Another site in the settlement between Folly Road and Stork House Drive (LAM007 in the SHLAA) displays similar characteristics to the allocated site at Lynch Lane. However, the proposed allocation is sound and there is no justification at this time for allocating further development within the AONB because the limit of 2,000 dwellings, as set out in the CS, would be

significantly breached. I note, however, that there is a commitment from the Council to reconsider this site as part of the WBLP preparation.

89. The requirements of the horse racing industry were raised, particularly with regard to the need for affordable housing for single people. However, it is CS policies CS 4 and CS 6 which establish the Council's approach to affordable housing and these are not currently under examination.

Pangbourne (HSA 22)

90. Pangbourne is identified as a Rural Service Centre and I saw that it enjoys a number of facilities and services. However, it sits within the AONB and is located on the River Pang and near to the River Thames with consequent issues of flood risk. Bearing in mind the role of Pangbourne I agree that some growth should be secured but that appropriate weight should be attached to the aforementioned constraints.
91. The Council is proposing one site for 35 dwellings on land north of Pangbourne Hill and west of River View Road and I have been advised that planning permission for 35 dwellings on the site (part outline/part full) was granted in February 2016. Concerns were raised by local residents, particularly with regard to flood risk, highway safety and landscape impact.
92. Policy HSA 22 includes requirements for a Flood Risk Assessment and a number of requirements relating to minimising visual intrusion and strengthening the planting. In terms of highway safety I am satisfied that an appropriate access to the site can be achieved and that the development of the site would not have significant consequences for highway safety elsewhere. The identified site currently includes the electricity sub-station. The Council acknowledges that this is not part of the developable area and it is proposed to amend the Site Plan accordingly. Other amendments to the Site Plan, for example with regards to the access and a landscape buffer, are required in order that the most appropriate strategy for the site is followed and to ensure that the requirements of the policy are accurately reflected on the Site Plan. In terms of the site access the Council has confirmed that it would be acceptable to route this through the landscape buffer and in all other respects it can be concluded that the allocation is sound. **MM33** is recommended accordingly. For effectiveness the policy should refer to 'approximately 2.24ha' and **MM34** is therefore recommended.

Bradfield Southend (HSA 23)

93. Bradfield Southend is a Service Village and although it sits within the AONB I consider it is reasonable that the settlement accommodates some growth in order to help sustain existing facilities and services. The allocated site off Stretton Close sits comfortably within the village. It is important, however, that the existing woodland is retained. Consequently it is recommended that the developable area is identified as 'approximately 0.6ha' (**MM35**); that it is a requirement of the policy that an arboricultural survey is submitted as part of any planning application; and that the indicative Site Plan correctly identifies the area of protected trees to be retained (**MM36**). In this way the proposal will reflect the most appropriate strategy to follow and be consistent with national policy.

94. Concerns were raised by local residents regarding, for example, flood risk, appearance and the ecological value of the land. However, the policy includes requirements relating to a Flood Risk Assessment (the Council considers that adequate mitigation measures could be provided); a habitat survey; and a Landscape and Visual Impact Assessment. I am satisfied that the Council's approach in Bradfield Southend is sound.

Chieveley

95. The Council was unable to identify any suitable sites for housing in Chieveley (primarily because of its location within the AONB) but is proposing a number of changes to the settlement boundary. However, two of the initially proposed changes (CHI017 and CHI001) do not meet the criteria for supporting a boundary change. I have given careful consideration to the submissions regarding the boundary of the settlement but I agree with the Council's assessment. Therefore, in order to ensure that the Council's countryside policies (for example C 1) are implemented with consistency across the District, the deletion of the final bullet point in paragraph 3.55 is necessary and **MM37** is recommended accordingly.

Compton (HSA 24)

96. Compton is a Service Village which lies within the AONB but the CS recognises that the Pirbright Institute site could provide a greater level of growth than would normally be appropriate in such a settlement. A Supplementary Planning Document relating to the site has been adopted by the Council.

97. The site is brownfield land in a reasonably sustainable location and the Council is proposing approximately 140 dwellings in a developable area of about 9.1ha. In other circumstances this density may be considered too low and it could be argued that the optimum use of the site is not being achieved. However, it is essential that any development respects the location of the site within the AONB and is compatible with other densities in the village (see Appendix A of PS/04/05/33). On that basis the proposed density is appropriate as a starting point. The significant areas required for landscape buffers are justified in order to ensure that, in particular, the visual consequences of the development on the AONB would be acceptable.

98. It has been suggested that a larger area for development could be identified but there is a risk that the provision of such a significant number of new dwellings in a relatively small settlement could have detrimental consequences, not only on the character of the village but also on the community itself and at this stage I consider that the balance between protecting the character of the locality and maximising the use of land, as proposed by the Council, is sound.

99. Issues of access, flood risk, impact on the adjacent Conservation Area (CA), viability and contamination have been raised by interested parties but there is no substantive evidence to demonstrate that the Council's approach in these respects is not sound. With regards to viability I accept that the margins are small but evidence submitted by the promoter of the site confirms that the

implementation of such a scheme is viable¹⁰.

100. In terms of the CA an additional bullet point in the policy is proposed, to require an explanation as to how the CA and its setting have been taken into account in any development proposals. **MM38** is therefore recommended thus ensuring that a satisfactory approach will be followed. In order to reflect the most appropriate strategy for the site, the correct developable area of 9.1 ha should be referred to, as recommended in **MM39**.
101. It has been confirmed that Compton Parish Council has commenced work on preparing an NP and the District Council has suggested that this could be the mechanism for giving further consideration to the future of the Pirbright Institute site. Whilst I consider the District Council's current approach is sound, any change in circumstances could be assessed and considered as part of the NP process.

Hermitage (HSA 25 and HSA 26)

102. Hermitage is a Service Village and having considered a number of sites, two have been allocated by the Council, as set out in policies HSA 25 and HSA 26. Currently the policies require both sites to be developed comprehensively together. However, there is no justification for such an approach, especially as each site can enjoy its own independent access. Indeed in terms of access it is possible to link the Charlotte Close site (HSA 25) with both Station Road and Charlotte Close. Similarly it is possible to gain access to HSA 26 via Lipscombe Close (with potential links to the Charlotte Close site). In order to reflect this increase in flexibility **MM41**, **MM42** and **MM44** are recommended.
103. Following reconsideration of the site areas corrected figures are recommended in **MM40** and **MM43**.
104. In order that proper consideration will be given to issues of ecological importance it is recommended that policy HSA 26 (land to the south-east of the Old Farmhouse) refers to the need to submit a Great Crested Newt Survey with any development proposal. **MM45** is therefore recommended.
105. In terms of the settlement boundary of Hermitage this has been redrawn to more accurately reflect the situation on the ground. However, the proposed inclusion of properties at Hermitage Green is not listed in paragraph 2.57. For the avoidance of doubt this reference should be included in the document and therefore **MM46** is recommended.
106. A number of residents voiced broad village-wide concerns regarding, for example, lack of infrastructure, traffic generation and rat-running, flood risk, ecological implications of development and the extent of landscape buffers. However, I am satisfied that the policies of both the CS and the HSADPD provide sufficient protection to the living conditions of residents and that appropriate sustainable development can be satisfactorily accommodated in Hermitage.

¹⁰ Ref: PS/04/14

Kintbury (HSA 27)

107. At my request, and in order to ensure that the consideration of potential options for housing allocations is based on the most up-to-date evidence, following the hearing session I invited the Council to re-assess the sustainability credentials of the allocated site at Layland's Green, Kintbury. Consequently the Council reconsidered three potential sites: to the east of Layland's Green; Kintbury Park Farm (Irish Hill Road); and land adjoining The Haven. Appendix 1 of PS/04/05/43 summarises the situation. The main issue is whether or not the proposed allocation at Layland's Green is sound.
108. There appear to be no significant impediments to the delivery of the allocated site. It is within walking distance of services and facilities; it has no significant landscape implications that cannot be mitigated; traffic generation is unlikely to be significant; and the site promoter has confirmed that delivery can be assured. Although it is a matter to which I have attached only little weight, I am also told that the release of this site may assist with the delivery of another site in Kintbury (in the same ownership) which has currently stalled for viability reasons¹¹.
109. I am satisfied that the allocated site is justified and deliverable and in all other respects is sound. It is not therefore necessary for me to assess the soundness of the other potential housing sites.

Great Shefford

110. Great Shefford is designated a Service Village but no sites are allocated for development in the settlement. Issues of flood risk and protecting the character of the AONB act as significant constraints to development. The Environment Agency is currently assessing flood alleviation measures for the village and there may be the opportunity to re-assess the ability of Great Shefford to accommodate some limited growth in the forthcoming review of the local plan, although the protection of the AONB is likely to remain a paramount objective.

Conclusion on Issue 6

111. The Council's approach to development in the AONB is consistent with the policies of the CS. It is the most appropriate strategy for the area which will enable the delivery of sustainable development. The policies for the North Wessex Downs AONB Spatial Area, as modified, are sound.

Issue 7 – Whether the allocations for Gypsies, Travellers and Travelling Showpeople are justified (Policies TS 1 to TS 4)

New Stocks Farm, Aldermaston (TS 1)

112. New Stocks Farm is an existing Gypsy and Traveller site. The allocation for 8 permanent pitches would use the existing access and would assimilate well

¹¹ Ref: PS/04/05/43b

into the surrounding environment. There was no objection to the proposal from the Office for Nuclear Regulation (the site being close to AWE Aldermaston) and I am satisfied that policy TS 1 is sound.

Long Copse Farm, Enbourne (TS 2)

113. Long Copse Farm is an existing site which accommodates four caravans for Travelling Showpeople and equipment associated with a Circus business. The allocation falls within the boundary of a site that has planning permission for a circus yard. The proposal is to provide 24 plots for Travelling Showpeople. Although the site is in a comparatively rural location I saw a number of facilities and services in the area and access into Newbury is relatively straightforward.
114. Concerns were raised regarding traffic on the nearby lanes but it is a requirement of the policy to provide a transport assessment which would identify any highway improvements that may be justified, including road widening and the provision of passing places. I conclude that policy TS 2 is sound.

Clappers Farm Area of Search, Beech Hill (TS 3)

115. During the course of the Examination the Council reconsidered the advice in the revised 'Planning Policy for Traveller Sites' (Department of Communities and Local Government – August 2015), particularly in terms of the definition of a 'Traveller'. A 'Gypsy and Traveller Accommodation Assessment' was undertaken in 2014 but the Council is not confident that it sufficiently reflects the up-dated advice referred to above and therefore it is proposed to delete policy TS 3.
116. I am mindful that the policy only identified an area of search for a Gypsy and Traveller site and that the provision of up to 9 pitches would be implemented after 2021. In these circumstances I agree that, as it stands, the policy is not sufficiently robust with regards to longer-term provision. I have considered whether or not this section of the HSADPD should be revised at this time but have concluded that a more pragmatic approach should be adopted and that revised proposals should be included within the forthcoming WBLP (anticipated adoption in 2019). This will ensure adequate short-term provision, whilst establishing that appropriate proposals for medium and longer term provision will be addressed shortly. **MM47** which deletes policy TS 3 and its supporting text is therefore recommended.

Planning Considerations for Traveller Sites (TS 4)

117. In order to ensure that any development relating to Traveller Sites is satisfactory in terms of, for example, design, living conditions, landscape impact and highway safety, policy TS 4 sets out all the relevant requirements. In this way the Council will be able to ensure that all issues of sustainability have been appropriately addressed. Policy TS 4 is sound.

Conclusion on Issue 7

118. The Council's policies for Gypsies, Travellers and Travelling Showpeople (as modified) are sound.

Issue 8 – Whether or not the policies relating to housing in the countryside (policies C 1 to C 8) are consistent with national policy

Location of New Housing in the Countryside (C 1)

119. Policy C 1 clearly establishes the Council's approach to the provision of housing in the identified settlements and towards development outside the settlement boundaries. It directs development to the most sustainable locations. However, six settlements were mistakenly omitted from the policy and consequently **MM48** (which adds those settlements to the list) is recommended in the interests of accuracy and consistency.
120. It was suggested that a number of settlement boundaries should be amended, for example at Bucklebury, Burghfield and Bradfield. However, none of these settlements fall within the settlement hierarchy as established in the CS and therefore the boundaries have not been reconsidered. This task will form part of the preparation for the forthcoming WBLP. With regard to the situation at Bradfield I fully understand the desire of the College to have a consistent policy framework in relation to its landholdings. However, saved policy ENV.27 of the West Berkshire District Local Plan (1991-2006) currently clearly sets out the requirements for any proposals related to educational and related development in the countryside (see also paragraph 126). The Council has confirmed that all settlement boundaries will be reviewed as part of the WBLP preparation and bearing in mind the existing policy framework, there is insufficient justification to make an exception at Bradfield at this time.
121. In order to clarify the Council's approach to development in the countryside it is proposed to confirm in policy C 1 that an exception to the restrictive countryside policies may be made with regard to limited infill in settlements in the countryside with no settlement boundary. **MM49** is therefore recommended. To that end the policy refers to such development being within a 'cluster of 10 or more existing dwellings adjacent to, or fronting an existing highway'. Such a reference provides certainty and enables a consistent approach to be taken across the District. Concerns were raised regarding the presumption against residential development outside the settlement boundaries but bearing in mind this policy relates to the countryside, much of which is within the AONB, I consider this restrictive approach to be justified.

Rural Housing Exception Policy (C 2)

122. The rural housing exception policy sets out the criteria against which small scale rural exception schemes would be assessed. The Council's approach is consistent with national policy as set out in paragraph 54 of the NPPF.

Design of Housing in the Countryside (C 3)

123. The design of all housing should be to a high standard but particular care needs to be taken in the countryside and in particular protected landscapes such as the AONB. Policy C 3 confirms that the Council will expect all housing proposals in the countryside to have regard to the impact of the development on the character of the area and its sensitivity to change. Such an approach accords with national policy and is sound.

Conversion to Residential Use (C 4)

124. The principle of the conversion of structurally sound and genuinely redundant buildings in the countryside is supported by national policy (NPPF paragraph 55). The criteria set out in policy C 4 will ensure that only appropriate proposals will be permitted.

Rural Workers' Housing (C 5)

125. Policy C5 supports the provision of new dwellings in the countryside in certain circumstances, for example where the need has been demonstrated; the design and location of the development would be appropriate; and no harm would be caused to the landscape character of the area. Such an approach accords with national policy and is sound.
126. There are a number of schools and institutional establishments in the countryside where the principle of some associated development may be acceptable. In order to confirm that the most appropriate strategy for such land uses is being promoted, it is recommended that additional text be added to the Plan, to include reference to saved policy ENV.27 of the West Berkshire District Local Plan which makes provision for appropriate new development associated with such uses (**MM50**). In order to clarify the Council's approach to dwellings that have been 'severed' from their holding, **MM51** is recommended.

Dwelling Extensions (C 6)

127. The importance of good design is a well-established requirement and policy C 6 confirms that extensions to dwellings in the countryside need to be of an appropriate scale and have no adverse impact on the character of the locality or the living conditions of nearby residents. These are reasonable and justified requirements.

Replacement Dwellings (C 7)

128. As with house extensions, the Council will support appropriately designed and located replacement dwellings in the countryside. Criterion ii of policy C 7 requires a replacement dwelling to be proportionate in size and scale to the existing dwelling. Whilst I understand that in a few circumstances it may be possible to satisfactorily accommodate a larger building on a site, I consider that this would be the exception and not the rule. Particularly in the AONB, great weight should be attached to conserving the landscape and scenic beauty and the Council is justified in affording protection to such areas by indicating the size of replacement building that would be acceptable.

Extension of Residential Curtilages (C 8)

129. The encroachment of residential curtilages into the countryside could have detrimental consequences for the appearance and character of these areas. The Council is therefore justified in setting out the criteria (in policy C 8) against which any such proposal would be assessed. In this way the inappropriate encroachment of 'development' into the countryside will be prevented.

Conclusion on Issue 8

130. Policies C 1 to C 8 (as modified) clearly establish the Council's approach to housing in the countryside. In an area such as West Berkshire, which includes much protected and valued landscape, such an approach is justified and in all other respects sound.

Issue 9 - Whether or not the policy relating to parking standards for new residential development (policy P 1) is justified

131. Policy P 1 sets out the parking standards for residential development and the justification for the approach taken is set out in the Topic Paper¹², with additional evidence being submitted, at my request, as PS/04/05/40 and /41. Account has also been taken of the advice on setting local standards in paragraph 39 of the NPPF.
132. Concerns were raised regarding the exclusion of garages from being counted as a parking space. Although to some this may seem illogical, it is not a position that is unique to West Berkshire. More often than not garages are used for other purposes than parking a car (for example storage) and therefore the demand for on-street parking rises, which in turn may have consequences for highway safety and also in terms of the visual quality of the area. Having read and heard the evidence on the matter (for example in relation to the survey work that has been undertaken) I conclude that the Council's approach, as set out in policy P 1, is justified.
133. The Council proposes to merge the parking requirement for 1 and 2 bed flats within the EUA zone and to amend the number of spaces required for two bed flats. This will provide consistency with the approach taken by the adjacent Reading Borough Council, increase flexibility and reflect a justified approach. **MM52** is therefore recommended.

Issue 10 - The effectiveness of the Council's approach to monitoring and delivery

134. In order to be found sound the HSADPD must be effective and in order to ensure effectiveness the document's policies must be capable of appropriate monitoring. Each policy has a comment relating to 'Delivery and Monitoring'

¹² Ref: CD/06/01

and Appendix 1 covers 'Housing Delivery and Trajectory'. It is clear from the evidence submitted by the Council (for example the 'Approach and Delivery Topic Paper' – CD/02/04) that the housing supply situation is satisfactorily monitored and that there are currently no reasons for me to conclude that there is any significant threat to the delivery of housing in West Berkshire.

Assessment of Legal Compliance

135. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The West Berkshire Housing Site Allocations DPD is identified within the approved LDS (October 2015) which sets out an expected adoption date of November 2016. Some delay was caused through having to find suitable venues for the hearing sessions and by the additional 'homework' that I requested from the Council. The delay was justified and the content and timing of the HSADPD are satisfactory.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in September 2014 (with minor amendment in January 2015) and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (April 2016) confirms that the policies in the HSADPD would not have a significant negative impact.
National Policy	The HSADPD complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The HSADPD complies with the Act and the Regulations.

Overall Conclusion and Recommendation

136. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

137. The Council has requested that I recommend main modifications to make the

Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the West Berkshire Housing Site Allocations Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Hogger

Inspector

This report is accompanied by the Appendix containing the Main Modifications