

**West Berkshire Council**  
**Local Plan Review 2022-2039**

**Site Selection Methodology**

**January 2023**

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## **1. Introduction**

- 1.1. The current Local Plan for West Berkshire (which comprises the Core Strategy Development Plan Document (DPD), Housing Site Allocations DPD, and the Saved Policies of the West Berkshire District Local Plan 1991-2006 (Saved Policies)) sets out our planning policies up to 2026 and we are now reviewing the Plan to cover the period up to 2037.
- 1.2. The purpose of the Local Plan Review (LPR) is to assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller accommodation) and employment land and other land uses up to 2039 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.
- 1.3. This document sets out the methodology that was used to identify suitable sites for residential and employment development to meet identified needs, the most suitable of which have been included as allocations within the proposed submission (Regulation 19) version of the West Berkshire Local Plan Review to 2039 (LPR). It should be read in conjunction with the Sustainability Appraisal / Strategic Environmental Assessment, Housing Background Paper, and Employment Background Paper. Together these documents supersede the Site Selection Background Paper that was prepared for the consultation on the emerging draft (Regulation 18) LPR in December 2020.

## **2. Policy context**

- 2.1. The preparation of the Council's site selection approach reflects the guidance as set out in the National Planning Policy Framework (NPPF, 2021)<sup>1</sup> and Planning Practice Guidance (PPG)<sup>2</sup>.

### **(a) NPPF**

- 2.2. Local Plans should be prepared in accordance with the NPPF to provide a positive vision for the future to facilitate sustainable development to include an overarching framework for addressing housing needs and other economic, social and environmental priorities that should align with infrastructure. Within the Local Plan, strategic policies should set out an overall strategy for the pattern, scale and quality of development, which includes making adequate provision for housing and employment.
- 2.3. Paragraph 23 of the NPPF states that Local Plans should indicate broad locations for strategic development. In paragraph 119, it is stated that planning policies should promote an effective use of land in meeting the needs for homes, with strategic policies setting out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land. One of the tests of soundness for Local Plans as set out in paragraph 35 of the NPPF is that to be justified they should be based on the most appropriate strategy when assessed against the reasonable alternatives. As such, the assessment of sites and how they compare against one another will be important to demonstrate reasonable alternatives have been considered.
- 2.4. In support of the government's objective of significantly boosting the supply of homes the NPPF reiterates the importance of identifying a sufficient amount and variety of land that can come forward, to meet local housing needs. It requires that the Council should have a 'clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment'.
- 2.5. Paragraph 81 of the NPPF also states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.6. Local planning authorities should use a robust and up-to-date evidence base to ensure that their Plan meets the identified local housing need for market and affordable housing, using the minimum standard method outlined in PPG as a starting point. Planning policies should identify 'specific, deliverable sites for years 1-5 of the plan period, specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan'.
- 2.7. The NPPF also supports the supply of large numbers of new housing through settlement extensions or new settlements. Paragraph 73 outlines the key considerations to identify well located, sustainable proposals, supported by the necessary infrastructure and services. There is an important role for the Local Plan to ensure delivery of sufficient homes across the District, identifying the most suitable

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<sup>1</sup> National Planning Policy Framework (2021): <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>

locations whilst considering the key constraints to development, such as environmental and heritage designations.

- 2.8. Additionally, the NPPF introduces the requirement to 'identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare' (paragraph 69). This will help ensure that a good mix of small and medium size sites are available to deliver housing over the plan period.
- 2.9. In terms of employment land the NPPF states that the Local Plan 'should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations' (paragraph 83).

#### **(b) Planning Practice Guidance (PPG)**

- 2.10. PPG on the Housing and Economic Land Availability Assessment sets out the approach to identify land that is suitable, available and achievable for housing and economic use over the plan period.
- 2.11. The assessment is a key part of the evidence base to inform the site selection process. However, it is important to note that it does not determine whether a site should be allocated for development. Rather it assesses and identifies a catalogue of sites that are potentially suitable for further consideration. In West Berkshire this document is the Housing and Economic Land Availability Assessment (HELAA).
- 2.12. This site selection methodology uses the HELAA as the starting point to identify which new sites should be allocated in the LPR.

### 3. How much growth needs to be planned for?

#### (a) Housing

- 3.1. Policy SP12 of the proposed submission (Regulation 19) LPR sets out that provision will be made for 8,721 to 9,146 net additional dwellings in West Berkshire for the period 1 April 2022 to 31 March 2039, or 513 to 538 dwellings per annum. The target figure is 538 dwellings per annum.
- 3.2. The lower end of the housing requirement is the Local Housing Need figure that has been calculated using the Government's standard method. The upper end of the housing requirement range is the LHN with a 5% buffer.
- 3.3. Further details on the housing requirement are set out in the Housing Background Paper<sup>3</sup>.

#### (b) Gypsy and Travellers

- 3.4. National policy requires Local Planning Authorities to set pitch and plot targets which address the likely permanent and transit needs in the area. A Gypsy and Traveller Assessment was prepared in 2019 and updated in 2021.
- 3.5. The Gypsy and Traveller Accommodation Assessment (2019 with update in 2021) sets out the need, and this is summarised below in Table 3.1 and Table 3.2 below.

Table 3.1. Gypsy and Traveller Accommodation Assessment

	<b>Cultural need</b> <i>Defined as those Gypsy and Travellers and Travelling Showpeople who do not travel and identify themselves as part of the Travelling and Showpeople community</i>	<b>Of which Planning Policy for Traveller Site (PPTS) need</b> <i>Based on the PPTS definition of Gypsies and Travellers</i>
<b>5 year authorised pitch shortfall (2021/22 to 2025/26)</b>	13	9
<b>Longer term need</b>		
2026/27 to 2030/31	5	3
2031/32 to 2035/36	9	6
2036/37 to 2037/38	3	2
<b>Longer term need total</b>	17	11
<b>Net shortfall 2021/22 to 2037/38</b>	30	20

Table 3.2. Travelling Showperson plot requirements 2021/22 to 2037/38

	<b>2021/22 to 2025/26</b>	<b>2026/27 to 2037/38</b>	<b>Total</b>
Travelling Showperson plots	20	4	24

<sup>3</sup> Housing Background Paper (January 2023): <https://www.westberks.gov.uk/local-plan-evidence>

- 3.6. The GTAA identifies a need of four transit pitches, which would accommodate eight caravans. No need is identified for houseboat dwellers.

**(c) Employment**

- 3.7. Policy SP20 of the proposed submission (Regulation 19) LPR sets out the strategic approach to employment land and seeks to facilitate the growth and forecasted change of business development over the plan period through site allocations and by promoting the supply of office and industrial space across the District. Using the findings of the Employment Land Review<sup>4</sup>, the supporting text to Policy SP20 sets out the need for a net increase of 50,816 sq.m of office floorspace, and 91,109 sq.m (23ha) of industrial floorspace.
- 3.8. Further details on the employment needs of the district are set out in the Employment Background Paper<sup>5</sup> and the Employment Land Review.

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<sup>4</sup> Employment Land Review (2022): <https://www.westberks.gov.uk/local-plan-evidence>

<sup>5</sup> Employment Background Paper (January 2023): <https://www.westberks.gov.uk/local-plan-evidence>

#### **4. Sources of supply**

4.1. Several sources of supply will ensure that there is a continuous supply of land for development across the plan period, and these include:

- Retained allocations from the adopted Local Plan (Core Strategy and Housing Site Allocations Development Plan Document (DPD)) and Stratfield Mortimer Neighbourhood Development Plan.
- Allocations in the current Local Plan which are not being retained.
- Existing planning commitments on unallocated sites.
- Existing planning commitments for communal accommodation (Use Class C2)
- Small residential site windfall allowance
- New sites allocated within the LPR
- New sites to be allocated within Neighbourhood Plans

4.2. This Site Selection Methodology Background Paper focuses specifically on how the new sites to be allocated within the LPR were identified. Information on the other sources of supply are set out in further detail in Background Papers.



## 5. Site selection methodology

- 5.1. The site selection process that has been used to identify new allocations has comprised of a stepped process, with sites being ruled out at each step.

### Step 1: identification of sites

- 5.2. The Council publicised a formal 'call for sites' between 23 December 2016 and 31 March 2017. The individuals and organisations on the Planning Policy Consultation Database were notified of the 'call for sites', and it was also advertised on the Council's website.
- 5.3. In response to numerous requests, the Council continued to accept sites for a further year. In addition, the Council re-opened the 'call for sites' during the Regulation 18 consultation on the LPR which ran from 9 November until 21 December 2018.
- 5.4. As part of the consultation on the emerging draft (Regulation 18) LPR, consultees were asked whether they were aware of any sites within the District that were available for permanent Gypsy and Traveller pitches. No permanent pitches were identified.
- 5.5. A focused call for sites for office uses took place between 26 November and 24 December 2021 to further explore the options to address the identified need for offices outlined within the Employment Land Review<sup>6</sup>. Seven sites were promoted.
- 5.6. In total 306 sites were promoted to the Council, however 17 have since been withdrawn by site promoters.

### Step 2: Housing and Economic Land Availability Assessment (HELAA)

- 5.7. All of the sites identified within Step 1 above were assessed within the HELAA. The HELAA forms part of the evidence base for the LPR, and its purpose is to assist in identifying suitable land which is available for development for different land uses, the development potential, and when development is likely to occur.
- 5.8. The inclusion of sites within the HELAA does not in itself determine that it is suitable for development, or that the land is available for development.
- 5.9. The HELAA was first published in February 2020, and an update published in December 2020 to coincide with the consultation on the emerging draft (Regulation 18) LPR. A third update will be published in January 2023 when the consultation on the proposed submission (Regulation 19) LPR commences.
- 5.10. The HELAA has been prepared in accordance with the joint HELAA methodology<sup>7</sup> that was developed and prepared with four other Berkshire authorities – Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council.
- 5.11. The methodology is based on, and complies with, the standard methodology in the PPG. The main stages are as follows:

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<sup>6</sup> Employment Land Review Update (December 2022): <https://www.westberks.gov.uk/local-plan-evidence>

<sup>7</sup> Berkshire Housing and Economic Land Availability Assessment Methodology (November 2016) <https://www.westberks.gov.uk/helaa>

- Stage 1 – identification of sites and broad locations
- Stage 2 – site and broad location assessment:
  - Estimating development potential
  - Assessing suitability
  - Assessing availability
  - Assessing achievability
- Stage 3 – windfall assessment
- Stage 4 – assessment review
- Stage 5 – final evidence base

5.12. The January 2023 HELAA assessed 289 sites, and 190 of these were determined to be ‘not developable within the next 15 years’. These sites have not been considered in any later stage as they are not considered to be reasonable alternatives. Appendix 4 of the HELAA includes the site assessments of all of the sites promoted to the Council.

Step 3: Sites within designated Neighbourhood Areas

- 5.13. Neighbourhood Plans establish general planning policies for development and the use of land in a defined neighbourhood area. Parish and town councils will lead in the preparation of a plan in areas which include all or part of a parished area.
- 5.14. Neighbourhood plans can include allocations, however this is not compulsory. If it is the intention for a plan to include allocations, then it is for the Parish/Town Councils to undertake their own site selection work in order to determine which site(s) are the most suitable for allocation.
- 5.15. As at December 2022, there are nine designated Neighbourhood Areas within the district meaning that neighbourhood plans are being produced within these areas. Not all however, will be including allocations as Table 3.1 below sets out:

Table 3.1: Neighbourhood plans

Designated Neighbourhood Area	Will the plan be including allocations?
Burghfield	<p>No. The Atomic Weapons Establishment (AWE) has a base within the Parish. Changes to legislation have resulted in the redetermination of the emergency planning arrangements around AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for the AWE Burghfield now cover the whole Parish.</p> <p>Due to the presence of the DEPZ, it is not considered appropriate to allocate further sites for housing in Burghfield.</p>
Compton	<p>The Compton Neighbourhood Plan was adopted on 10 February 2022, and it does not include allocations.</p> <p>Compton is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential.</p> <p>There is an allocation within the HSA DPD for 140 dwellings on the site of the former Pirbright site, and the Core Strategy Inspector’s report identified that the site could provide a higher level of growth than is normally expected in a service village.</p>

Designated Neighbourhood Area	Will the plan be including allocations?
	<p>Development at the former Pirbright site is still outstanding, however outline planning permission has been granted for 180 dwellings. This allocation is being retained in the LPR.</p> <p>Whilst the HELAA identifies two sites that have potential, it is considered that due to the scale of development that is to take place at the Pirbright site, there should be no further allocations within Compton in the period up to 2039. This is particularly because Compton is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), a nationally important and legally protected landscape. The National Planning Policy Framework (NPPF) is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. In addition, although close to the A34 and M4, local roads are rural in nature and not suitable for heavy traffic.</p>
Cold Ash	<p>A requirement of 40 dwellings was identified for the Cold Ash designated Neighbourhood Area in the emerging draft (Regulation 18) LPR. No requirement for employment was identified as the Parish Council were only looking to allocate sites for residential development.</p> <p>Site selection work was undertaken by the Cold Ash Neighbourhood Plan Steering Group (a sub-group of the Parish Council), and this concluded only one site was suitable for allocation. This site is located within the settlement boundary whereby there is a presumption in favour of development. Sites within settlement boundaries are not being allocated. This is because settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.</p>
Hermitage	No. New allocations within Hermitage have been considered through the LPR.
Hungerford	Residential allocations only.
Lambourn	Residential allocations only.
Newbury	No. New allocations within Newbury have been considered through the LPR.
Stratfield Mortimer	<p>A Neighbourhood Development Plan for Stratfield Mortimer was adopted in May 2017, and includes an allocation for 110 dwellings. The whole site has outline planning permission, and Reserved Matters permission has been granted on part of the site. The site has only just started to deliver.</p> <p>Given the outstanding dwellings still to deliver, it is considered that there should not be any new allocations within the plan period. It is however recognised that windfall development may come forward over the plan period.</p>
Tilehurst	No. New allocations within Tilehurst have been considered through the LPR.

- 5.16. If a Neighbourhood Plan is including allocations, then the LPR has not considered any new allocations within these areas, although it should be noted that some of the retained allocations from the current Local Plan do fall within designated Neighbourhood Areas.

- 5.17. The exception however, is if a site is strategic in nature, and this is because the NPPF states at paragraph 13 that neighbourhood plans must contain non-strategic policies.
- 5.18. The NPPF in respect of what constitutes a strategic site, there is no statutory definition nor how it must be defined. The now revoked Planning Policy Statement 12 had a section in it which said of strategic sites: *“These should be those sites considered central to achievement of the strategy. Progress on the core strategy [now local plans] should not be held up by inclusion of non-strategic sites.”* This is not repeated in current policy or guidance. It is however a succinct way of defining the broad characteristics of what a strategic site should be.
- 5.19. The Planning Advisory Service produced guidance in 2014<sup>8</sup> which advised that strategic sites have the following characteristics:
- Is the site critical to the delivery of the spatial strategy for your district or borough?
  - What is the added value in defining clear site boundaries within the core strategy?
  - Would you fail to meet the spatial vision for the district or borough if the site was not delivered in the plan period?
  - Which of your local plan spatial objectives would the site help deliver?
  - Is the site required to deliver national, sub regional or regional objectives? For example, strategic housing and/or employment growth identified at a regional level as major urban extensions or ‘areas of search’?
  - Is it required to deliver infrastructure which is central to the delivery of the plan and its objectives? For example, sites that include land for strategic new transport corridors, flood protection measures and meeting the district's carbon targets?
  - Can you demonstrate stakeholder buy-in and sufficiently robust evidence (sources of funding, timescales for delivery, gaps in funding, contingency) to be reasonably certain that the specific infrastructure requirements of any strategic sites can be delivered?

Step 4: Sites located in ‘open countryside’ or settlements outside of the settlement hierarchy

- 5.20. As part of work on the LPR the Council has reviewed the way in which development is delivered in the most sustainable locations. The settlement hierarchy guides the broad location of new and sustainable development, and takes account of the function and sustainability of settlements across the district. Such an approach is in conformity with the NPPF which states at paragraph 9 that *“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”*
- 5.21. The existing settlement hierarchy (as currently set out within Core Strategy policy ADPP1<sup>9</sup>) has been re-assessed to ensure that it is up-to-date, in line with national policy, and that it remains an accurate reflection of the role settlements will play in

<sup>8</sup> Planning Advisory Service Good Plan Making Guide (September 2014):

<https://www.local.gov.uk/sites/default/files/documents/entire-guide-4c0.pdf>

<sup>9</sup> West Berkshire Core Strategy (July 2012): <https://info.westberks.gov.uk/corestrategy>

the spatial strategy. This work is set out within the Settlement Hierarchy Review Topic Paper<sup>10</sup>.

5.22. The revised settlement hierarchy is set out in Table 3.2 below:

Table 3.2: Revised settlement hierarchy

<b>Urban area</b>	Wide range of services and the focus for the majority of development	Newbury, Thatcham, Eastern Urban Area (Tilehurst, Calcot and Purley on Thames)
<b>Rural Service Centre</b>	Range of services and reasonable public transport provision - opportunities to strengthen role in Rural Service Centres meeting requirements of surrounding communities	Burghfield Common, Hungerford, Lambourn, Mortimer, Pangbourne, Theale
<b>Service Villages</b>	More limited range of services and some limited development potential	Bradfield Southend, Chieveley, Cold Ash, Compton, Great Shefford, Hermitage, Kintbury, Woolhampton

5.23. Sites which were not ruled out in the HELAA were assessed to determine which settlement they fell in. Sites in settlements below the hierarchy or in 'open countryside' have been ruled out from further consideration because they are considered to be within unsustainable locations. The exception to this has been the employment sites as several of the Designated Employment Areas are located in locations outside of the settlement hierarchy. In addition, paragraph 85 of the NPPF is clear that planning policies should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

Step 5: Sites within settlement boundaries

5.24. Settlement boundaries identify the main built up area of a settlement in which development is likely to be considered acceptable in principle, subject to other policy considerations.

5.25. Within the LPR, sites that fall within the settlement boundary will not be allocated given that development is acceptable in principle.

Step 6: Sustainability Appraisal / Strategic Environmental Assessment

5.26. Local planning authorities are required to consider wider social, environmental, and economic effects when preparing a plan, and it is a legal requirement for local plans to be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) throughout their preparation.

5.27. A SA/SEA has been prepared to support the proposed submission (Regulation 19) LPR, and this appraises those sites not ruled out in Steps 1 to 5 above. These sites are considered to be reasonable alternatives.

5.28. The SA/SEAs conclude that the strategic sites of Sandleford Park in Newbury and North East Thatcham will have a predominantly very positive effect and that the effect from the non-strategic sites will be predominantly neutral.

<sup>10</sup> West Berkshire Settlement Hierarchy Review Background Paper: <https://info.westberks.gov.uk/evidencebase>

- 5.29. The site SAs are included within Appendices 8b (residential) and 8c (employment) of the SA/SEA<sup>11</sup>.

Step 7: Preparation of a Gypsy and Travellers Accommodation DPD

- 5.30. In order to meet the identified need for traveller pitches the Council has committed to producing a separate Gypsy and Traveller Accommodation DPD upon which work has already started. A 15+ year’s strategy, with vision and strategic objectives. It will contain policies and allocations to meet the Gypsy and Traveller accommodation needs identified in the District. The Local Development Scheme (LDS) that was revised in October 2022 anticipates the following timescales for the DPD:

Table 4.3: Timetable for the preparation of the Gypsy and Traveller Accommodation DPD

<b>Formal stages of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</b>				
<b>Regulation 18</b>	<b>Regulation 19</b>	<b>Regulation 22</b>	<b>Regulation 24</b>	<b>Regulation 26</b>
<b>Public participation in the preparation of the DPD (including sustainability appraisal &amp; scope &amp; content of DPD)</b>	<b>Publication of Proposed Submission Documents</b>	<b>Submission to Secretary of State</b>	<b>Start of Independent Examination</b>	<b>Adoption</b>
February 2023 - December 2025	December 2025	March 2026	July 2026	September 2027

<sup>11</sup> West Berkshire Sustainability Appraisal Report (December 2022): <https://info.westberks.gov.uk/evidencebase>