

West Berkshire Council
Local Plan Review 2022-2039

Local Plan Review 2022-2039
Examination

Written Statement for Matter 3

Spatial Strategy

16 February 2024

February 2024

West Berkshire Local Plan Review 2022-2039 (LPR) Examination

West Berkshire Council

Written Statement for Matter 3: Spatial Strategy

Response to each question raised by the Inspector:

M3.1 The spatial strategy (Policy SP1) and settlement hierarchy (Policy SP3)

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

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

- 1.1. Yes. Policy SP1 sets out an appropriate spatial strategy that will contribute to the achievement of sustainable development in West Berkshire. The approach taken in the LPR builds on the settlement pattern and spatial strategy as set out in the Core Strategy (policy ADPP1 in [SD1](#)).
- 1.2. As part of the scoping exercise undertaken in 2018 under Regulation 18, the Council undertook a review of the existing Core Strategy strategic objectives, and a review of the existing spatial strategy for the District, among others. The scoping report is available in [CD12](#).
- 1.3. The Scoping Report Consultation Statement ([CD14](#)) outlines that overall, the majority of respondents stated that they thought the existing spatial strategy had worked well and that it would continue to be the most appropriate approach for development up to 2036. This was also largely reflected in the responses to the further consultations at Regulation 18 (Consultation Statement [CD16](#)) and Regulation 19 (Consultation Statement [CD4a](#)). This information, together with the SA/SEA has led to the formulation of the spatial strategy as set out in policy SP1, which seeks to deliver the spatial vision and strategic objectives for the District over the plan period and inform the preparation of neighbourhood plans.
- 1.4. Through the settlement hierarchy, policy SP1 steers development to the most sustainable locations, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity, while conserving and enhancing the environmental assets of the District.

- 1.5. Options within West Berkshire are limited. Paragraph 4.6 of the Submission LPR ([CD1](#)) makes clear that West Berkshire contains a number of physical and environmental constraints which influence the location of development.
- 1.6. Paragraphs 4.19 and 4.20 of the Submission LPR ([CD1](#)) set out that the focus for development will be on existing settlements, using the settlement hierarchy, set out in policy SP3. The existing urban areas are regarded as the most suitable locations for future development by virtue of their existing access to services and facilities. The strategy seeks to make effective use of brownfield land, and opportunities for infill development and the re-use of brownfield land are greatest in those settlements at the upper levels of the hierarchy, particularly in Newbury. Further greenfield allocations are, however, needed, and the plan allocates a range of sites of varying sizes with higher levels of development at the higher levels of the hierarchy. The approach in the different spatial areas reflects the different characteristics of the different parts of West Berkshire, and the level of development in the individual settlements of the hierarchy will vary depending on their character, role and function, as well as their constraints and availability of sites.
- 1.7. In response to each sub question, the Council responds as follows:
- 1.8. (a) Yes, the spatial strategy set out in policy SP1 will ensure that Newbury retains its role as the administrative centre and major town centre, and will be a focus for housing and business development and the main focus for office development. Policy SP1 requires development to follow the district-wide settlement hierarchy set out in policy SP3. By directing development to Newbury as a main urban area, the main administrative and town centre with a range of essential services, the policy is encouraging development and redevelopment within the settlement boundary and on previously developed land in the most sustainable location. The strategy will deliver a range of site sizes for residential development. In Newbury there are already significant existing commitments, and additional development will come forward through the strategic site allocation at Sandford together with some smaller non-strategic sites allocated within the LPR.
- 1.9. The strategy will deliver higher densities within the town centre where the extent and capacity of supporting infrastructure, services and facilities are the greatest. The policy sets out that main town centre uses, including offices, will be located in accordance with policy SP22, and within the town centre schemes will be of an appropriate scale and character to respond to the role and function of the centre and to support sustainable communities. Through policy SP22, the strategy will support redevelopment/regeneration proposals within the town centre that provide a net additional contribution to office space to assist in meeting identified needs. Town centres play a vital role for communities, and these will need to adapt to meet the changing needs of communities and support the vitality of the town centre itself.
- 1.10. Newbury's accessibility in terms of access to rail and the strategic road network will mean that it remains a key focus for business investment and

development. The town centre and existing Protected Employment Areas (to be renamed Designated Employment Areas through the LPR) will continue to play an important role in addressing the existing and future economic demands that will support the vitality of the District's economy. Additional employment opportunities will reduce the need for out-commuting and increase opportunities for existing and new residents. Policy SP1 promotes sustainable patterns of development, with the prioritisation of previously developed land. The Council will continue to pursue the regeneration of the London Road Industrial Estate, now renamed Bond Riverside, as an important edge of centre site within the town that has potential to deliver additional business development.

- 1.11. (b) Yes, the spatial strategy set out in policy SP1 will ensure that Thatcham will be a focus for housing, business development, regeneration and improved services and facilities.
- 1.12. Prior to the adoption of the Core Strategy ([SD1](#)) in 2012 Thatcham saw considerable housing growth, and therefore the focus in the Core Strategy, was one of consolidation. The Inspector for the Core Strategy examination recommended that the approach to Thatcham may need to be reviewed if additional development had to be accommodated in the District in the future (para 65 of the Inspector's final report).
- 1.13. As part of the LPR additional development does need to be provided within the District over the plan period and in line with the spatial strategy and NPPF ([NAT1](#)) the most sustainable locations should be the focus for development. The Visioning exercise ([SET3a](#)) recognises the importance of such an approach, contributing to the 15/20 minute neighbourhood and protecting and enhancing the natural environment. The spatial strategy in policy SP1 promotes development within settlement boundaries and outlines that additional development will come forward on large strategic sites and smaller non-strategic sites allocated within the LPR. The settlement hierarchy identifies Thatcham as an urban area, with a good range of services and facilities, and good access to the road network and railway station. Given its sustainability and the recommendations from the Core Strategy Inspector, it is appropriate for Thatcham to be a focus for new housing development. As well as existing commitments, the LPR allocates a strategic site allocation in North East Thatcham along with a non-strategic site along Lower Way.
- 1.14. A strategic development can boost infrastructure through economies of scale, rather than piecemeal development on smaller sites across the District. The Thatcham Strategic Growth Study (Thatcham Past [SIT2a](#), Thatcham Present [SIT2b](#), Thatcham Future [SIT2c](#)) was commissioned to David Lock Associates and outlines the benefits of developing at a strategic level, and aids in identifying new and/or upgraded infrastructure.
- 1.15. Additional development of this scale, co-located within business development will have the potential to stimulate interest in the regeneration of the town centre. This is evidenced by the Council's recent work on the Thatcham Town Centre Strategy. Whilst the town offers a good range of services and

facilities, the spatial strategy encourages the regeneration of the town and the provision of improved services and facilities. This will enable the town to fulfil its role within the District's hierarchy of centres set out in policy SP22. The strategy recognises that town centres play a vital role for communities, and these will need to adapt to meet the changing needs of communities and support the vitality of the town centre itself.

- 1.16. The strategy will deliver higher densities within the town centre where the extent and capacity of supporting infrastructure, services and facilities are the greatest. The policy sets out that main town centre uses, will be located in accordance with policy SP22, and within the town centre schemes will be of an appropriate scale and character to respond to the role and function of the centre and to support sustainable communities.
- 1.17. Thatcham hosts some well established employment locations, with the largest being Colthrop Industrial Estate which is home to a number of high-value technology companies as well as a number of logistics and warehousing businesses. The town's location on the A4 which is part of the Freight Route, its proximity to the railway station and accessibility to two junctions of the M4 means that Thatcham is a suitable and sustainable location for further business development. Policy SP1 promotes sustainable patterns of development, with the prioritisation of previously developed land. It also outlines the need for greenfield allocations to address development needs, and as such, the LPR allocates a site for business development on land east of Colthrop Industrial Estate, further increasing the job opportunities in the town for existing and new residents and reducing the need to out-commute.
- 1.18. (c) Yes, the spatial strategy set out in policy SP1 will ensure that the villages surrounding Newbury and Thatcham retain their existing roles. The Submission LPR ([CD1](#)) paragraph 4.8 notes that the character of these rural areas contrasts visibly with the more urban areas of Newbury and Thatcham.
- 1.19. Paragraphs 4.19 and 4.20 of the Submission LPR ([CD1](#)) set out that the focus for development will be on existing settlements, using the settlement hierarchy, set out in policy SP3. This steers development to the most sustainable areas, with an appropriate balance between urban and rural development. Policy SP3 sets out that development in smaller settlements with settlement boundaries and which are not included in the settlement hierarchy, will be delivered in accordance with policy SP1. The Council considers such villages to include settlements such as Cold Ash, Ashmore Green, Upper Bucklebury, Stockcross, and Enborne Row. Development and redevelopment within the settlement boundaries of these settlements will continue to be supported. Outside of settlement boundaries development will be more restricted as set out in policies DM1 and DM35.
- 1.20. As set out in the Settlement Hierarchy Topic Paper ([SET1a](#)) there has been a detailed review of settlements and their place in the hierarchy, using both a quantitative and qualitative assessment.
- 1.21. The Council is acutely aware that the pressure for development around Newbury and Thatcham has the potential to lead to the loss of the separate

and distinct identity of these surrounding villages. The spatial strategy in policy SP1 therefore makes clear the role of the existing villages will also be retained by ensuring the integrity of the visual break and sense of openness between these settlements is maintained through policy DM2. The Appropriate Countryside Designation Study ([SET2](#)) provides the evidence for this approach.

- 1.22. (d) The Eastern Area has significant constraints to development, including floodplain, the adjoining North Wessex Downs National Landscape (AONB) and the Detailed Emergency Planning Zone (DEPZ) around the Burghfield AWE and Aldermaston AWE sites. Within the Eastern Area there are three rural service centres, Burghfield Common, Mortimer and Theale. Rural service centres provide the role of a focal point for the surrounding villages and rural areas in terms of the provision of services and facilities and are locations where some development could potentially enhance or strengthen their role.
- 1.23. The level of development in the individual settlements of the hierarchy will vary depending on their character, role and function, as well as their constraints and availability of sites. As set out within the Site Selection Topic Paper ([SIT1](#)) the location of Burghfield Common within the DPEZ has restricted its development opportunities, and the Stratfield Mortimer Neighbourhood Development Plan has an allocation for 110 dwellings, which has yet to be implemented.
- 1.24. Theale is a vibrant village which maintains a distinct identity and sense of community. The rural service centre hosts a range of shops and businesses in the High Street, which also supports the wider area, and it has good access to the highway network, railway station and the open countryside. Policy SP1 requires development to follow the district-wide settlement hierarchy as set out in policy SP3 which takes account of the function and sustainability of settlements and promotes sustainable communities. The policy also promotes development within settlement boundaries and outlines that additional development will come forward on large strategic sites and smaller non-strategic sites allocated within the LPR. As well as existing commitments, two non-strategic site allocations have been proposed in Theale and these reflect the character of the settlement, the landscape value of the North Wessex Downs National Landscape (AONB) and flood risk within the area.

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

- 1.25. Yes. The Settlement Hierarchy Topic Paper ([SET1a](#)), together with appendices: Appendix 1 – Audit Criteria for Services and Facilities ([SET1b](#)), Appendix 2 – Settlement Audit ([SET1c](#)), Appendix 3 – Audit Matrix and Settlement Scores ([SET1d](#)), Appendix 4 Review of Settlement Hierarchy Tiers ([SET1e](#)), and Appendix 5 Qualitative Assessment ([SET1f](#)) reviews the existing settlement hierarchy as set out in the Core Strategy ([SD1](#)). This assessment was undertaken in 2020 and is based on both a quantitative and qualitative assessment. The topic paper ([SET1a](#)), acknowledges that the

review of the hierarchy is a snapshot in time, as facilities within settlements and accessibility to those settlements may change over time. The revised settlement hierarchy assists in determining the location of future development in West Berkshire. It categorises the District's settlements according to their different roles, functions and sustainability and groups them accordingly.

- 1.26. The topic paper ([SET1a](#)), outlines that the review of settlements follows the NPPF ([NAT1](#)), as set out in Table 1, which outlines the indicators for considering sustainability and community facilities. The National Planning Practice Guidance ([NAT2](#)) has also been used to guide the review. It is therefore considered that the basis of the scoring system is appropriate and justified as it uses national planning policy.
- 1.27. The existing settlements were considered, using a scoring system based on the audit of services and facilities, to assess the sustainability of each settlement. The criteria are set out in Appendix 1 of the Settlement Hierarchy Topic Paper ([SET1b](#)), the audit is set out in Appendix 2 ([SET1c](#)), and the scores are set out in Appendix 3 ([SET1d](#)).
- 1.28. All stages of the settlement hierarchy review have been undertaken with consultation. The methodology for reviewing the settlement hierarchy was provided in the Regulation 18 consultation held between November and December 2018 ([CD15](#)). Further feedback came from town councils, parish councils and neighbourhood planning groups in February and March 2020 ([CD4b](#) page 3) following locally held presentations and discussion, and follow up questionnaires.
- 1.29. As part of the Regulation 18 consultation (November to December 2018) there were 71 responses ([CD16](#) pages 8-11). The overall approach to having a settlement hierarchy was generally endorsed, and the two stage qualitative and quantitative process was supported. It was acknowledged that the provision of services and facilities could change over time, and therefore further work would be necessary over the lifetime of the Plan to ensure that settlements continued to remain in the most appropriate category. The main concerns arising from the consultation related to the methodology, particularly the clarity surrounding the scores given to specific services or facilities. The points system was therefore refined following the 2018 consultation. This is set out in pages 11-13 of the Settlement Hierarchy Topic Paper ([SET1a](#)).
- 1.30. The audit of services and facilities aided in assessing whether the existing settlement position in tiers was still relevant. Table 4 on page 17 in the Settlement Hierarchy Topic Paper ([SET1a](#)) outlined the settlement hierarchy based on overall scores alone. Additional determining factors for sustainability were then applied to understand the scope of facilities and accessibility by measuring the extent of the key services and public transport available in combination with the overall score. Local knowledge (officers, town/parish councils, and neighbourhood development groups) was also used in the qualitative assessment of the settlement hierarchy. The qualitative assessment is outlined in full in Appendix 5 ([SET1f](#)). In determining a settlement's position in the hierarchy specific circumstances were examined,

- 1.31. and the value and importance attributed to a facility by the local community was also considered. Cross boundary functional relationships were also considered in the assessment. This resulted in settlements being removed from the hierarchy, and ultimately led to the settlement hierarchy as set out in policy SP3.
- 1.32. Part of the Council's response to [PQ21](#) (in [EXAM2](#) pages 42-47) to the Inspector's Preliminary Questions ([IN2](#)) focused on the reasonable alternatives for the spatial strategy, including the settlement hierarchy.
- 1.33. The Council's response set out that the settlement hierarchy was considered as part of the SA/SEA for the Regulation 18 consultation in December 2020 ([CD17a](#)). Two options were assessed for policy SP3, to either continue with the existing policy (policy ADPP1 in the Core Strategy ([SD1](#))) or revise with greater specification. Thus, policy SP3 is linked to the spatial strategy (policy SP1) and allows for more detail to be provided.
- 1.34. It is considered that the settlement hierarchy, based on an existing hierarchy which was tested through the Core Strategy examination, has been subject to a thorough, informed and evidenced review. It has followed national policy as set out in the NPPF ([NAT1](#)), and involved the community at all appropriate stages. The methodology has been refined and alterations made. It is considered that the settlement hierarchy aids in delivering development in the most appropriate locations, and follows the spatial strategy as set out in policy SP1.

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

- 1.35. The Council considers that the settlement boundaries defined on the Policies Map are based on proportionate evidence as set out in the Settlement Boundary Review Background Paper ([SET9](#)). Paragraphs 7 to 23 of that Paper set out the landscape led approach taken in cooperation with town and parish councils and neighbourhood planning groups across the District.
- 1.36. A number of responses to the Regulation 19 consultation raised specific issues in relation to individual settlements:
 - **Boxford**

In response to Pro Vision on behalf of the Trustees of Allan Snook Will Trust (PS1128) the Council refers to its response to Boxford Parish Council set out in the Settlement Boundary Review Background Paper ([SET9](#)) Appendix 4, page 2.
 - **Bradfield**

In response to Lucy White Planning on behalf of Bradfield College (PS15) the boundary has been drawn in order to protect the character and form of the existing settlement.

- **Burghfield Common**

In response to Charlesgate Homes (PS719) the boundary has been drawn in order to protect the character and form of the existing settlement. It notes that the representation is seeking the inclusion of a 2.3 hectare site being promoted for development of approximately 43 dwellings.

- **Chieveley**

In response to Jane Parkin (PS1760) and Charles Manly (PS1866) the Council refers to its response to Councillor Hilary Cole set out in the Settlement Boundary Review Background Paper ([SET9](#)) Appendix 4, pages 12 -13.

- **Cold Ash**

In response to Susan Shakespeare (PS364), the Council notes that the proposed boundary at Alley Gully in Cold Ash remains unchanged from the existing boundary in this area.

- **Hampstead Norreys**

In response to Hampstead Norreys Parish Council (PS847) the Council refers to its response set out in the Settlement Boundary Review Background Paper ([SET9](#)) Appendix 4, page 17.

In response to Celia Geyer (PS560) the boundary in this area has been drawn in order to protect the character and form of the existing settlement.

- **Hungerford**

In response to Pro Vision on behalf of Cala Homes (PS1219) the Council refers to its response to Hungerford Town Council set out in the Settlement Boundary Review Background Paper ([SET9](#)) Appendix 2, page 10.

- **Lambourn**

In response to Carter Planning on behalf of Mr R L Jones (PS1146) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. It notes that the representation is seeking the inclusion of a 3.05 hectare site being promoted for development of approximately 46 dwellings.

- **Newbury**

In response to Southern Planning Practice on behalf of the Saunders family (PS246) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. It notes that the representation is seeking the inclusion of a 6.43 hectare site being promoted for development of between 115-150 dwellings.

In response to Pro Vision on behalf of Rivar Ltd (PS577) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. It notes that the representation is seeking the inclusion of a 1.05 hectare site being promoted for development of approximately 10-12 dwellings.

In response to Barton Willmore (Stantec) on behalf of Donnington Valley Group Ltd (PS1350) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. It notes that the representation is seeking the inclusion of a 46.59 hectare site being promoted for development.

In response to Pro Vision on behalf of Feltham Properties (PS747) the boundary in this area has been drawn in order to protect the character and form of the existing settlement.

- **Pangbourne**

In response to Turley Associates on behalf of Pangbourne College (PS1546) the boundary in this area has been drawn in order to protect the character and form of the existing settlement.

- **Streatley**

In response to Bluestone Planning on behalf of Mr and Mrs T Gallagher (PS372) the Council refers to its response set out in the Consultation Statement (Appendix 1 Regulation 18 consultation [CD4a](#) Annex K page 16).

- **Thatcham**

The issues raised by Thatcham Town Council (PS1706), Bucklebury Parish Council (PS1289) and Simon Pike (PS1808), relating to the boundary at North East Thatcham are dealt with in the Council response to Q4.20.

In response to Iver Consulting on behalf of Prosper Infinity Ltd (PS1678) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. It notes that the representation is seeking the inclusion of a 1.72 hectare site being promoted for development of approximately 45 dwellings.

In response to Nexus Planning on behalf of Croudace Homes (PS1524) the boundary in this area has been drawn in order to protect the character and form of the existing settlement.

- **Upper Bucklebury**

In response to Woolf Bond Planning on behalf of Siobhan McElhinney (PS1572) the Council refers to its response to Bucklebury Parish Council set out in the Settlement Boundary Review Background Paper ([SET9](#)) Appendix

2, page 18. The boundary in this area has been drawn in order to protect the character and form of the existing settlement.

- **Yattendon**

In response to Barton Willmore (Stantec) on behalf of Yattendon Estate (PS1160) the Council does not consider that the site meets the criteria for inclusion within the settlement boundary. The boundary has been drawn in order to protect the character and form of the existing settlement.

- 1.37. Whilst the Council does not consider any changes are necessary to the settlement boundaries as a result of the issues highlighted above, it is proposing a modification to the settlement boundary around part of Sandleford Park, to the west of Newbury College and to the south of Crook's Copse. The inclusion of this land would reflect the area permitted for development as part of the Sandleford Park East planning application ([reference APP/W0340/W/20/3265460](#)) and would be in accordance with the settlement boundary review criteria set out on page 7 of the Settlement Boundary Review Background Paper ([SET9](#)). A map showing the proposed modification to the Policies Map is attached as Appendix 1.
- 1.38. With the proposed modification to the settlement boundary of Newbury around Sandleford Park, yes, the Council considers that the settlement boundaries defined on the Policies Map are appropriate and based on proportionate evidence.

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

- 1.39. The policy for each type of settlement in the settlement hierarchy requires that development will be delivered on 'non-strategic sites allocated for housing and economic development through other policies in the LPR or neighbourhood plans'. For the Urban Areas this also refers to strategic sites. Thus, policy SP3 applies equally to both the LPR and neighbourhood plans. However, it is appreciated that the term 'or' could be interpreted as having development delivered through sites in the LPR or neighbourhood planning, rather than either or both. The Council therefore proposes a modification to the policy as follows:

Urban Areas:

b) Strategic and non-strategic sites allocated for housing and economic development through other policies in the LPR and/or neighbourhood plans'.

Rural Service Centres:

f) Non-strategic sites allocated for housing and economic development through other policies in the LPR and/or neighbourhood plans'.

Service Villages:

i) Non-strategic sites allocated for housing and economic development through other policies in the LPR and/or neighbourhood plans’.

1.40. With this modification, the Council considers that policy SP3 sets out an effective and justified approach.

M3.2 AWE Aldermaston and AWE Burghfield (policies SP4 and DM33 and Appendix 3)

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

1.41. Yes, the Council considers that the policy is consistent with national policy and relevant legislation. National policy is set out in the NPPF ([NAT1](#)) paragraph 97 and in Annex 2 glossary and also in Planning Practice Guidance ([NAT2](#)) Hazardous Substances. The Council considers Policy SP4 conforms with both.

1.42. Annex 2 Glossary states:

“Major hazard sites, installations and pipelines: Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.”

1.43. The Planning Practice Guidance ([NAT2](#)) states:

“When preparing [Local Plans](#), local planning authorities are required to have regard to the prevention of major accidents and limiting their consequences. They must also consider the long-term need for appropriate distances between hazardous establishments and population or environmentally sensitive areas. They must also consider whether additional measures for existing establishments are required so that risks to people in the area are not increased. Detailed requirements are set out in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

Further guidance can be found under [dealing with hazardous substances in plan-making](#)”.

1.44. Both the Aldermaston and Burghfield sites are large industrial complexes which contain in addition to standard industrial material, high explosives and radioactive substances. The sites are the nations’ nuclear munitions factories, keeping the nation safe. They are identified as Upper Tier Control of Major Accident Hazard Regulations (COMAH sites) but are not subject to the Health and Safety Executives Planning Application Advice (PADHI+)

which cannot be used for; “developments around nuclear sites, explosive sites or quarries. In these cases, planning authorities must consult the appropriate HSE Directorate for advice.

- 1.45. Through the preparation of the LPR the Office for Nuclear Regulation has been regularly consulted (PS62).

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

- 1.46. Yes. The Council refers to its response to Q3.5 above.

M3.3 North Wessex Downs AONB (policy SP2)

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

- 1.47. Yes, the Council considers policy SP2 is consistent with national policy relating to AONBs (which were rebranded on 22nd November 2023 as National Landscapes). Policy SP2 accords with both paragraphs 176 and 177 of the NPPF ([NAT1](#)).
- 1.48. The Council refers to the clear endorsement from the North Wessex Downs Council of Partners to both the overall landscape led approach being adopted and the approach taken to the consideration of major development. This is set out in the Consultation Statement (Appendix 1 Regulation 18 consultation [CD4a Annex H page 110](#)).
- 1.49. The Council notes the recent introduction of the Levelling Up and Regeneration Act 2023 which has amended Section 85 of the Countryside and Rights of Way Act 2000. It therefore proposes the following minor modification to paragraph 4.24 of the supporting text to policy SP2 to reflect this amendment:
- “ ... Under Section 85 of the Countryside and Rights of Way Act 2000 (as amended), the Council has a duty to ~~have regard to~~ seek to further the primary purpose of designation.....”
- 1.50. The Council also proposes further minor modifications to the Submission LPR to amend references to the AONB as appropriate throughout the document and accompanying Policies Map to reflect the rebranding of AONBs as follows:

“AONB National Landscape”

Add 2 new definitions to Appendix 9: Glossary as follows:

“Area of Outstanding Natural Beauty (AONB) – a nationally important landscape protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty. On 22 November 2023 AONBs across England and Wales became known as National Landscapes but the formal designation, and the legal protections, remain the same. In West Berkshire, the North Wessex Downs National Landscape is designated as an AONB.

National Landscape (NL) - see Area of Outstanding Natural Beauty”

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

- 1.51. Yes, as set out in the Housing Background Paper ([HOU6](#), pp.20-24) and the Council’s response to PQ30 (in [EXAM2](#) pages 73-74) to the Inspector’s Preliminary Questions ([IN2](#)), the Council considers that the exceptional circumstances test as defined in paragraph 177 of the NPPF ([NAT1](#)) has been demonstrated to justify the allocation of sites RSA14 to RSA23.

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

- 1.52. Yes, the Council refers to its response to PQ30 (in [EXAM2](#) pages 73-74) to the Inspector’s Preliminary Questions ([IN2](#)). It considers that the proposed modification is necessary to make the Plan sound.
- 1.53. The Council considers that the proposed modification to the supporting text of Policy SP2 would be effective in that it provides clarity that the allocated sites will not need to demonstrate the exceptional circumstances at the planning application stage, assuming all the requirements of the relevant site allocation policy and relevant development plan policies have been met.

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

- 1.54. Yes, the Council refers to its response to PQ31 (in [EXAM2](#) pages 74) to the Inspector’s Preliminary Questions ([IN2](#)). It considers that it is necessary to make the Plan sound. The responsibility of preparing a neighbourhood plan and the selection of any sites within a neighbourhood plan lies with the qualifying body, or LPA in the event that the qualifying body chose not to include allocations.
- 1.55. The Council considers that the proposed modification to the supporting text of policy SP2 would be effective in that it makes clear that the exceptional

circumstances test must be demonstrated through individual neighbourhood plans. It also clarifies that an allocated site within a neighbourhood plan will not need to demonstrate the exceptional circumstances at the planning application stage, assuming all the requirements of the relevant site allocation policy and relevant development plan policies have been met.

M3.4 Housing requirement for neighbourhood areas

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

- 1.56. Yes, the Council considers that the figures are justified and consistent with national policy. The Council refers to its response to PQ16 (in [EXAM2](#) pages 32-33 and 105-110) of the Inspector's Preliminary Questions ([IN2](#)). This explains that the placing of settlements within the District hierarchy were taken into consideration when determining the requirements.
- 1.57. The spatial strategy for the District is set out within policy SP1, and this policy is clear that the focus of development in each spatial area will follow the District-wide settlement hierarchy. The settlement hierarchy (as set out in policy SP3) has been informed by the function and sustainability of settlements.
- 1.58. The response to PQ16 also outlines that the available development opportunities identified within the Housing and Economic Land Availability Assessment (HELAA, [SIT4a](#) and [SIT4e](#)) were also considered. The NPPF ([NAT1](#)), paragraphs 68 and 122) and PPG ([NAT2](#), Paragraph: 001 Reference ID: 3-001-20190722) is clear that availability is a key factor when identifying a sufficient supply of sites and is necessary when determining which sites are suitable to meet requirements.
- 1.59. 74% of the District lies within the North Wessex Downs National Landscape (AONB), including Hungerford and Lambourn. The primary purpose of the designation is to conserve and enhance the natural beauty of the area. The spatial strategy for AONBs, as set out within policy SP2, is that growth should be appropriate and sustainable and should conserve and enhance its special landscape qualities.
- 1.60. It is important to note that there is no statutory requirement for neighbourhood plans to include residential site allocations, and this choice has been made by three Qualifying Bodies:
- Hermitage Parish Council
 - Newbury Town Council
 - Tilehurst Parish Council

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

- 1.61. Yes. Strategic policy-making authorities are required by paragraph 66 of the NPPF ([NAT1](#)) to set out a housing requirement for designated neighbourhood areas when establishing the housing requirement for their area. At the time of preparation of the LPR, only Hungerford and Lambourn had expressed an intention to include residential site allocations in their emerging NDPs. As such, figures have been provided for these areas.
- 1.62. NDPs, when adopted, form part of the overall development plan for the District. To take account of any additional NDPs wishing to allocate that might come forward in the lifetime of the LPR, as well as any modifications to adopted NDPs, the proposed modification provides clarity that this supply will be additional to that set out in the LPR and thus provide flexibility to the housing supply numbers.
- 1.63. To ensure the effectiveness of the proposed modification the Council considers it necessary to add the word ‘additional’ to the modification as follows:
- “The Council will supply a housing requirement figure to those qualifying bodies either preparing or updating a neighbourhood plan that intends to include residential allocations.
- Any **additional** sites allocated through the neighbourhood planning process will be in addition to sites allocated within this LPR.”
- 1.64. The Council considers that the proposed modification, with this amendment, is necessary to make the Plan sound and would be effective in that regard.

M3.5 Settlement boundaries (policies SP1 and SP3)

Q3.13. Is the strategic approach of restricting development outside settlement boundaries set out in policies SP1 and SP3 justified and consistent with national policy?

- 1.65. Yes, the Council considers the strategic approach of restricting development outside settlement boundaries is justified and consistent with national policy. Paragraph 174 of the NPPF ([NAT1](#)) makes clear that planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. Policies SP1 and SP3 seek to direct development to the most appropriate locations where there are

existing services and contribute to enhancing the rural character of the countryside.

M3.6 Separation of settlements around Newbury and Thatcham

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

- 1.66. Yes, the Council considers that the policy is justified and consistent with national policy. Whilst gaps are not directly referenced in the NPPF ([NAT1](#)), paragraph 130 of that document makes clear that planning policies should ensure that new developments maintain a strong sense of place. Gaps do that, performing a legitimate planning purpose in preventing settlements merging together.
- 1.67. Policy DM2 will be effective in preventing the coalescence of Newbury and Thatcham and maintaining the separate identity of Donnington; Enborne Row/Wash Water; Cold Ash; and Ashmore Green. The Council refers to the Appropriate Countryside Designation Study ([SET2](#)) as evidence.
- 1.68. Paragraph 9.12 of the Submission LPR ([CD1](#)) makes clear that the land included within each identified gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements has been included.
- 1.69. Paragraph 9.13 of the Submission LPR ([CD1](#)) sets out why the land between Thatcham and Upper Bucklebury has not been designated as a gap under this policy.

M3.7 Key Diagram

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

- 1.70. Yes, the Council refers to its response to PQ17 (in [EXAM2](#) page 34) to the Inspector's Preliminary Questions ([IN2](#)). It considers that the proposed modification is necessary to make the Plan sound and effective in accordance with national policy.

M3.8 Site selection methodology

Q3.16. (a) Were the sites allocated in the Plan selected on the basis of adequate and proportionate evidence? (b) Collectively, are the allocations

consistent with the spatial strategy and settlement hierarchy set out in policies SP1 and SP3?

- 1.71. (a) Yes, the Council considers the sites allocated in the Plan were selected on the basis of adequate and proportionate evidence. The starting point for the site selection work was the Housing and Economic Land Availability Assessment (HELAA). Sites were thoroughly assessed and as set out within the section 'Step 2b: Assessing suitability' of the HELAA ([SIT4a](#), pp. 17-21), various evidence studies have informed the assessment of sites. These included input from specialist advisors, surveys of sites, information on designations and evidence studies such as Landscape Sensitivity and Capacity Assessments and Strategic Flood Risk Assessment.
- 1.72. The HELAA has been subject to regular reviews since it was first published in February 2020, with updates published in December 2020 and January 2023.
- 1.73. (b) Yes, the Council considers that collectively the allocations are consistent with the spatial strategy and the settlement hierarchy. The spatial strategy for the District, as set out within policy SP1, identifies three spatial areas and requires development to follow the district-wide settlement hierarchy.
- 1.74. The Site Selection Methodology Paper ([SIT1](#)) outlines the steps taken to identify new residential sites for allocation. Step 4 (pp. 12-13 of [SIT1](#)) explains that sites not located adjacent to a settlement within the settlement hierarchy, ie. in an isolated location or adjacent to a settlement below the hierarchy, were ruled out from further consideration.
- 1.75. Sites not ruled out in steps 1 to 5 were considered to be 'reasonable alternatives' and considered in the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).
- 1.76. The SA/SEA Environmental Report for the Proposed Submission Local Plan Review ([CD3a](#)) clearly sets out on pages 49 to 75 that the proposed new residential allocations are consistent with the settlement hierarchy and spatial strategy.

APPENDIX 1

Proposed Modification to Newbury Settlement Boundary at Sandlefors Park

1:4098

