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Appendix 1 – SOS DCO East Northants

IN THE HIGH COURT OF JUSTICE

Claim No. CO/917/2020

QUEEN'S BENCH DIVISION

PLANNING COURT

B E T W E E N

EAST NORTHAMPTONSHIRE COUNCIL

Claimant

-and-

SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT

Defendant

- and -

LOURETT DEVELOPMENTS LTD

Interested Party

=====

CONSENT ORDER

=====

UPON the parties agreeing to the terms hereof

BY CONSENT IT IS ORDERED THAT:

1. Permission is granted and the decisions of the Defendant, dated 24 January 2020 and carrying reference number APP/G2815/W/193232099, to allow the Interested Party's appeal under s.78

of the Town and Country Planning Act 1990, and to make a partial award of costs in favour of the Interested Party, are quashed pursuant to s.288 of the same Act.

2. The appeal is remitted to be determined de novo.
3. The Defendant pay the Claimant's costs in the amount of £8616.66

Dated: This 7th Day of May 2020

PARTICULARS

- A. These proceedings concern an application brought under section 288 of the 1990 Act by the Claimant against (1) the decision of the Defendant to allow the Interested Party's appeal against the decision of the Claimant to refuse planning permission for residential development at land to the west of numbers 7-12 The Willows, Thrapston, NN14 4LY and (2) the decision to make a partial award of costs against the Claimant in respect of that appeal.
- B. The Defendant has carefully considered the Inspector's decision and the Claimant's Statement of Facts and Grounds and Reply, and the evidence served in support. He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework ("NPPF") as a 'closed list'. It is not. The proper interpretation of the definition is that any site which can be shown to be 'available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.
- C. The Defendant therefore considers that it is appropriate for the Court to make an Order quashing the decisions and remitting the appeal to be determined de novo.
- D. The Interested Party agrees that the decisions should be quashed and the appeal remitted to be determined de novo.

Appendix 2 – Newport Road, Woburn Sands – SOS Decision Letter



Ministry of Housing,
Communities &
Local Government

Timothy Waller
Waller Planning Ltd
Suite A, 19-25 Salisbury Square
Old Hatfield
Hertfordshire
AL9 5BT

Our ref: APP/Y0435/W/17/3169314

25 June 2020

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL MADE BY WAVENDON PROPERTIES LTD
LAND TO THE EAST OF NEWPORT ROAD AND TO THE EAST AND WEST OF
CRANFIELD ROAD, WOBURN SANDS, BUCKINGHAMSHIRE MK17 8UH
APPLICATION REF: 16/00672/OUT**

1. I am directed by the Secretary of State to say that consideration has been given to the report of Tom Gilbert-Wooldridge BA (Hons) MTP MRTPI IHBC, who held a public local inquiry from 14 - 23 January 2020 into your client's appeal against the decision of Milton Keynes Council to refuse your client's outline application, with all matters except the means of access reserved for subsequent approval, for residential development of up to 203 dwellings, a doctor's surgery, open space and landscaping, together with pedestrian, cycle and vehicular access from Newport Road and Cranfield Road and supporting infrastructure, in accordance with application ref: 16/00672/OUT, dated 20 July 2016.
2. On 31 October 2017, this appeal was recovered for the Secretary of State's determination, in pursuance of section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act 1990.
3. The Secretary of State initially issued his decision in respect of the above appeal in his letter dated 5 December 2018. That decision was challenged by way of an application to the High Court and was subsequently quashed by order of the Court dated 14 June 2019. The appeal has therefore been redetermined by the Secretary of State, following a new inquiry into this matter. Details of the original inquiry are set out in the 5 December 2018 decision letter.

Inspector's recommendation and summary of the decision

4. The Inspector recommended that the appeal be dismissed.
5. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions and agrees with his recommendation. He has decided to dismiss the appeal.

Ministry of Housing, Communities & Local Government
Jean Nowak, Decision Officer
Planning Casework Unit
3rd Floor Fry Building
2 Marsham Street
London SW1P 4DF

Tel: 0303 444 1626
Email: PCC@communities.gov.uk

A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Matters arising since the close of the inquiry

6. On 18 May 2020, the Secretary of State wrote to the main parties to afford them an opportunity to comment on a letter from Milton Keynes Council dated 12 May 2020 which included a recent appeal decision relating to Rectory Farm, Woburn Sands Road, Bow Brickhill, Milton Keynes, MK17 9JY. A list of the representations received in response to this letter is at Annex A. These representations were circulated to the main parties on 27 May 2020 and 3 June 2020. The Secretary of State is satisfied that all representations received have been given full and due consideration, and no other new issues were raised in this correspondence to warrant further investigation or necessitate additional referrals back to parties. Copies may be obtained on written request to the address at the foot of the first page of this letter.
7. In his letter of 16 August 2019, confirming the reopening of the inquiry, the Secretary of State explained that one change in circumstance he considered material to the redetermination was the announcement by Highways England, in September 2018, that corridor B (central option) had been selected as the preferred corridor for the Oxford-Cambridge Expressway (IR1.16). The Secretary of State has noted that, in March 2020 Highways England announced that work had paused on the Oxford-Cambridge Expressway while they undertook further work on other potential road projects that could support the government ambition on the Oxford-Cambridge Arc (<https://highwaysengland.co.uk/project-update-12-march-2020/>). The Secretary of State has also noted that none of the parties have made representations to him on this announcement. The Secretary of State does not consider the pausing of the work raises any matters that would require him to refer back to the parties for further representations prior to reaching his decision on this appeal.

Policy and statutory considerations

8. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
9. In this case the development plan consists of Plan:MK 2016-2031 (Plan:MK), Woburn Sands Neighbourhood Plan 2014 (WSNP) and Site Allocations Plan 2018 (SAP). The Secretary of State considers that relevant development plan policies include those set out at IR3.3-3.9.
10. Other material considerations which the Secretary of State has taken into account include the National Planning Policy Framework ('the Framework') and associated planning guidance ('the Guidance').
11. In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCA Act), the Secretary of State has paid special regard to the desirability of preserving those listed buildings potentially affected by the proposals or their settings, or any features of special architectural or historic interest which they may possess.

Main issues

Housing Land Supply

12. The Secretary of State has considered the Inspector's analysis at IR12.4-12.64. For the reasons given at IR12.8-12.12 the Secretary of State agrees with the Inspector that it is acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable as of 1 April 2019 (IR12.11). Like the Inspector, the Secretary of State does not consider it necessary to apply a 1 October 2019 base date (IR12.12). For the reasons given at IR12.13-12.15, the Secretary of State agrees with the Inspector that a proforma can, in principle, provide clear evidence of a site's deliverability (IR12.14). The Secretary of State also agrees with the Inspector that it would not be appropriate to automatically disregard all the sites owned by Homes England and Milton Keynes Development Partnership (IR12.15). For the reasons given at IR12.16-12.25 the Secretary of State agrees with the Inspector that there is no reason to apply a greater discount than the Council's rate (IR12.19). The Secretary of State agrees with the approach the Inspector has taken to prior approval sites in this case (IR12.22).
13. The Secretary of State has noted that the Globe and Castlethorpe Road appeal decisions came to different conclusions on whether the Council could demonstrate a 5-year housing land supply (HLS) (IR12.23), but he agrees that, as the Inspector's conclusions in this case are based on the evidence before him, this should be regarded as being sufficient to explain any difference from the findings of the Castlethorpe Road or Globe Inspectors (IR12.25).
14. The Secretary of State has considered the Inspector's assessment of disputed sites at IR12.26-12.60. For the reasons given, the Secretary of State agrees with the Inspector that the Council can demonstrate a HLS of 5.5 years for the base date of 1 April 2019 (IR12.61). The Secretary of State has also noted that the Inspector finds that, for a base date of 1 October 2019, there would be a 5-year HLS of 5.99 years (IR12.62). However, as already indicated in paragraph 12 above, the Secretary of State agrees with the Inspector that it is not necessary to apply a 1 October base date. The Secretary of State also agrees with the Inspector that the Council's Scenarios 2 and 3 do not affect his findings on HLS (IR12.63-64).
15. Overall, the Secretary of State agrees with the Inspector's conclusion at IR12.65 that the Council can demonstrate a 5-year supply of deliverable housing sites whichever approach is taken in terms of the base date, and even with the application of the Council's lapse rate.
16. The Secretary of State has noted that, in their correspondence of 26 May 2020 and 12 June 2020, the appellant has referred to the potential impact of the current Covid-19 pandemic on house building. He has also noted that the appellant submitted a document with their correspondence of 26 May 2020 issued by the Council entitled 'Rectory Farm decision and the Implications for Five-Year Housing Land Supply', published on 29 April 2020. The Secretary of State considers that, as the quantification in that document is based on the appellant's modelling using a past event and they have not put forward specific evidence about the deliverability of individual sites, it does not affect his judgement in this case.

The location of the development

17. For the reasons given at IR12.66-12.71 and IR12.74, the Secretary of State agrees with the Inspector that the location and type of the appeal development does not comply with Policies DS1, DS2 and DS5 of Plan:MK and WSNP policies WS5 and WS6. He further agrees that there is no inconsistency with the Framework in terms of how WSNP Policies WS5 and WS6 seek to safeguard the countryside and direct developments to specific locations, and that these policies can be given significant weight (IR12.71). The Secretary of State agrees with the Inspector that the housing would not be in an appropriate location having regard to the development plan and national policies (IR12.74). He further agrees that the conflict with the development plan in terms of the location of the proposal carries substantial weight (IR12.101).
18. For the reasons given at IR12.72 the Secretary of State agrees with the Inspector that the proposal does not conflict with the development plan insofar as the proposed Oxford to Cambridge Expressway is concerned. He also agrees with the Inspector that there is no conflict with the development plan or other reason to refuse the proposal in relation to the East-West rail project (IR12.73).

Housing Density

19. For the reasons given at IR12.75-12.82, the Secretary of State agrees with the Inspector that the final density figure cannot be established at this point (IR12.78). Like the Inspector the Secretary of State considers that, while the final layout and density of the development has yet to be fixed, a scheme based on the illustrative layout with a density of 16-20dph would be relatively low but would be acceptable in this instance for this location. It would balance an efficient use of land with respecting the surrounding character and setting and so would accord with Plan:MK Policy HN1 and NPPF paragraph 122 (IR12.81).

Other matters

Best and most versatile agricultural land

20. For the reasons given at IR12.83 the Secretary of State agrees with the Inspector that the loss of Grade 3a agricultural land within the site would conflict with Plan:MK Policy NE7. However, the Secretary of State also agrees with the Inspector that this would not, in itself, be a reason for refusal and carries only moderate weight (IR12.99).

Ecology and drainage

21. For the reasons given at IR12.84-12.87 the Secretary of State agrees with the Inspector that the development would not have an unacceptable effect on ecology or protected species (IR12.86). The Secretary of State further agrees that the development offers the means to alleviate current drainage problems through additional attenuation and the use of a suitable maintenance regime (IR12.87). The Secretary of State considers that the environmental enhancement of ecology and the provision of drainage measures to try to address existing problems are benefits which should be afforded moderate weight (IR12.97).

Highways and parking

22. The Secretary of State notes that the appellant's updated Transport Assessment concludes that there would be very modest impacts on all junctions as a result of the

development (IR12.88 and IR12.96). For the reasons given the Secretary of State agrees with the Inspector that only limited weight can be afforded to any highway benefits (IR12.96).

Facilities and services in Woburn Sands

23. For the reasons given at IR12.89, the Secretary of State agrees with the Inspector that there is little evidence to indicate that the development would have an unacceptable impact on services and facilities in Woburn Sands.

Heritage assets

24. For the reasons given at IR12.90-12.91 the Secretary of State agrees with the Inspector that the development would result in less than substantial harm to the significance of the Grade II listed Deethe Farmhouse. He also agrees with the Inspector that the level of harm would be low due to the existing setting and the proposed mitigation measures. Nevertheless, paragraphs 193 and 194 of the Framework state that great weight should be given to the conservation of listed buildings and any harm weighed against the public benefits (IR12.91).
25. The Secretary of State also agrees with the Inspector that, given the existing screening and distances involved, there would be no harm caused to either the Grade II listed park and garden at Wavendon House or the Grade II* Wavendon House itself (IR12.92).

Character and appearance of the landscape

26. For the reasons at IR12.93 the Secretary of State agrees with the Inspector that the development would have a very limited effect on the character and appearance of the landscape. Therefore, the Secretary of State affords little weight to any harm.

Other benefits

27. For the reasons given in IR12.94 the Secretary of State agrees with the Inspector that the provision of affordable housing beyond the minimum policy requirement should carry significant weight. The Secretary of State also agrees with the Inspector that the provision of market housing should be afforded significant weight given the potential number of dwellings that could be delivered and the eagerness of the appellant as a small to medium sized developer to deliver housing as swiftly as possible.
28. The Secretary of State agrees with Inspector that there are a range of economic benefits (IR12.95) and affords these moderate weight. For the reasons given in IR12.97 the Secretary of State agrees with the Inspector that little weight can be afforded to the appellant's claim of a high-quality living environment given the limited information at outline stage and the policy requirement that all development should be high quality.

Planning conditions

29. The Secretary of State has given consideration to the Inspector's analysis at IR11.1-11.2, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 55 of the Framework and the relevant Guidance. He is satisfied that the conditions recommended by the Inspector comply with the policy test set out at paragraph 55 of the Framework. However, he does not consider that the imposition of these conditions would overcome his reasons for dismissing this appeal and refusing planning permission.

Planning obligations

30. Having had regard to the Inspector's analysis at IR11.3-11.5, the planning obligation dated 27 February 2020, paragraph 56 of the Framework, the Guidance and the Community Infrastructure Levy Regulations 2010, as amended, the Secretary of State agrees with the Inspector's conclusion for the reasons given in IR11.6 that the obligation complies with Regulation 122 of the CIL Regulations and the tests at paragraph 56 of the Framework. However, the Secretary of State does not consider that the obligation overcomes his reasons for dismissing this appeal and refusing planning permission.

Planning balance and overall conclusion

31. For the reasons given above, the Secretary of State considers that the appeal scheme is not in accordance with Plan:MK Policies DS1, DS2, DS5 and NE7 and WSNP policies WS5 and WS6, and is not in accordance with the development plan overall. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in accordance with the development plan.

32. Weighing in favour of the proposal, the Secretary of State affords the provision of affordable housing significant weight and also affords the provision of market housing significant weight. The economic benefits are given moderate weight, and the Secretary of State also gives moderate weight to ecology and drainage benefits. The Secretary of State affords limited weight to any highway benefits; and little weight to the appellant's claim of a high quality living environment..

33. Weighing against the proposal, the Secretary of State considers the housing would not be in an appropriate location having regard to the development plan and national policies. He further considers that the conflict with the development plan in terms of the location of the housing carries substantial weight as it would not accord with the spatial strategy in Plan:MK. The Secretary of State affords moderate weight to the loss of BMV agricultural land. The Secretary of State gives little weight to any harm to the landscape or character of the area.

34. The Secretary of State has considered whether the identified 'less than substantial' harm to the significance of the Grade II listed Deethe Farmhouse is outweighed by the public benefits of the proposal. In accordance with the s.66 duty, he attributes considerable weight to the harm. The public benefits have been summarised in paragraph 32 of this letter.

35. Overall the Secretary of State agrees with the Inspector at IR12.98 that the benefits of the appeal scheme are collectively sufficient to outbalance the identified 'less than substantial' harm to the significance of the Grade II listed Deethe Farmhouse. He considers that the balancing exercise under paragraph 196 of the Framework is therefore favourable to the proposal

36. The Secretary of State considers that other matters covered in this decision letter are neutral in the planning balance.

37. Overall the Secretary of State considers that the material considerations in this case indicate a decision in line with the development plan – i.e. a refusal of permission.

38. The Secretary of State therefore concludes that the appeal should be dismissed and planning permission refused.

Formal decision

39. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby dismisses your client's appeal and refuses outline planning permission, with all matters except the means of access reserved for subsequent approval, for residential development of up to 203 dwellings, a doctor's surgery, open space and landscaping, together with pedestrian, cycle and vehicular access from Newport Road and Cranfield Road and supporting infrastructure, in accordance with application ref: 16/00672/OUT, dated 20 July 2016

Right to challenge the decision

40. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the Town and Country Planning Act 1990.

41. A copy of this letter has been sent to Milton Keynes Council and Woburn Sands Town Council.

Yours faithfully

Jean Nowak

Authorised by the Secretary of State to sign in that behalf



Report to the Secretary of State for Housing, Communities and Local Government

by Tom Gilbert-Wooldridge BA (Hons) MTP MRTPI IHBC
an Inspector appointed by the Secretary of State

Date 27 March 2020

Town and Country Planning Act 1990

Milton Keynes Council

Appeal by Wavendon Properties Limited

Inquiry Held on 14-17 and 21-23 January 2020
An accompanied site visit was undertaken on 20 January 2020

Land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands,
Buckinghamshire MK17 8UH

File Ref: APP/Y0435/W/17/3169314

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GLOSSARY

APPxx	Appellant's proofs of evidence for redetermined inquiry
APS	Annual Position Statement
BMV	Best and most versatile agricultural land
CD	Core Document
CIL	Community Infrastructure Levy
DL	Secretary of State's first decision letter
dpa	Dwellings per annum
dph	Dwellings per hectare
EIA	Environmental Impact Assessment
GPDO	The Town and Country Planning (General Permitted Development) (England) Order 2015
ha	Hectare
HLS	Housing land supply
ID	Inquiry Document
IR	The first Inspector's report
LPApp	Council's proofs of evidence for redetermined inquiry
LVA	Landscape and Visual Assessment
MKDP	Milton Keynes Development Partnership
MOU	Memoranda of Understanding
NLP	Nathanial Lichfield & Partners
NPPF	National Planning Policy Framework
OB	Optimism bias
PINS	The Planning Inspectorate
Plan: MK	Plan: MK 2016-2031, adopted March 2019 as a development plan document for Milton Keynes
PPG	Planning Practice Guidance
RID	Redetermined Inquiry Document
S106	A legal agreement made under Section 106 of the Town and Country Planning Act 1990
SAP	Site Allocations Plan 2018
SEMK	South East Milton Keynes site
SME	Small and medium-sized enterprises
SOCG	Statement of Common Ground
SoS	Secretary of State
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
TA	Transport Assessment
TCPA 1990	The Town and Country Planning Act 1990
TPO	Tree Preservation Order
WSNP	Woburn Sands Neighbourhood Plan

File Ref: APP/YO435/W/17/3169314

Land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands, Buckinghamshire MK17 8UH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Wavendon Properties Ltd against the decision of Milton Keynes Council.
- The application Ref 16/00672/OUT, dated 20 July 2016, was refused by notice dated 5 December 2016.
- The development proposed is an outline planning application with all matters except the means of access reserved for subsequent approval described as '**residential development of up to 203 dwellings, a doctor's surgery, open space and landscaping, together with pedestrian, cycle and vehicular access from Newport Road and Cranfield Road and supporting infrastructure**'.
- This report supersedes that issued on 2 February 2018. The original decision on the appeal was quashed by order of the High Court.

Summary of Recommendation: That the appeal be dismissed.

1. Procedural Matters

- 1.1. **This section is based on the first Inspector's report** and has been updated as necessary.

Summary of appeal chronology

- 1.2. The original inquiry into this appeal opened on 11 July 2017 and closed on 19 July 2017. Although requests that the appeal be determined by the Secretary of State (SoS) were refused in August 2017¹, the SoS subsequently directed that he should determine this appeal himself in letters dated 31 October 2017². The **original Inspector's report was** submitted on 2 February 2018 with a recommendation to allow the appeal and grant planning permission subject to conditions. The SoS disagreed and dismissed the appeal³. The appellant challenged the decision in the High Court. The decision was quashed by order of the High Court on 14 June 2019⁴ and sent back to the SoS for redetermination. The SoS decided to re-open the inquiry, which opened on 14 January 2020 and ran for 7 days. The inquiry was closed in writing on 28 February 2020 once outstanding documents were received, including a completed and executed Section 106 (S106) agreement.

The proposal in outline

- 1.3. The appeal site extends across almost 15.2ha. It consists of about half a dozen fields, often enclosed behind mature hedges and trees, that wrap around the assorted residential streets and cul-de-sacs that project behind Newport Road and either side of Cranfield Road at the northern end of Woburn Sands. The main part of the town lies to the south beyond the Bletchley to Bedford railway line and a level crossing. The proposal is made in outline with all matters except the means of access reserved for subsequent approval. An illustrative

¹ ID26

² ID27

³ CD10.33

⁴ CD10.34

layout plan and a parameters plan⁵ show how up to 203 dwellings and a **doctor's surgery** could be laid out across the site along with associated landscaping and open space.

*The application and the **Council's decision***

- 1.4. The original planning application was reported **to the Council's** development control committee on 1 December 2016⁶. In the absence of sufficient housing land being identified as available to meet requirements over the next 5 years, the scheme was recommended for approval, subject to conditions and the execution of a S106 Agreement securing contributions towards the provision of health and education facilities, parks, play and community facilities, together with the maintenance of open space. The reasons for the recommendation were as follows:

"With the lack of a five year housing land supply, the strategic policies of the Development Plan are out of date, as outlined by the National Planning Policy Framework. Having weighed all other matters, the proposed development is considered to represent a sustainable form of development in terms of its social, environmental and economic functions and the proposed development is therefore acceptable in principle. Access to the site is considered appropriate and would not put undue pressure on the local road network and there are no other fundamental issues that would warrant a refusal of the application. All other detailed matters would be considered under reserved matters applications at a later date. In the light of these comments and the report above, approval is recommended."

- 1.5. However, the committee decided to refuse the application contrary to the recommendation. The reasons for refusal were⁷:

1. The Committee resolved to refuse planning permission on the basis that any such development of this site would result in the loss of future development and infrastructure options, causing significant and demonstrable harm and is therefore not sustainable development in accordance with Resolution 24/187 of the United Nations General Assembly definition of sustainable development and the National Planning Policy Framework (NPPF) in respect of future generations. The development would also therefore be contrary to paragraphs 14 and 19 of the National Planning Policy Framework, Saved Policy D1 of the adopted Milton Keynes Local Plan 2001-2011 (adopted 2005) and policy WS5 of the Woburn Sands Neighbourhood Plan 2014-2026 (adopted 2014). This does not constitute sustainable development in terms of paragraph 14 of the National Planning Policy Framework.
2. Furthermore the low density of this proposed development would not be considered sustainable given the current objectives of central government and this Council to both optimise use of land and to build both quickly and strategically.

- 1.6. **In the Council's Statement of Case for the first inquiry, the first reason for refusal was effectively amended to read:**

1. The development would be contrary to policy WS5 of the Woburn Sands Neighbourhood Plan 2014-2016 ([sic] adopted 2014). This does not constitute

⁵ CDs1.4, 1.5 and 1.7

⁶ CD3.2

⁷ CD3.4

sustainable development in terms of paragraph 14 of the National Planning Policy Framework.

The reasons for recovery

- 1.7. An initial request to recover this appeal for determination by the SoS was made on the basis that the development exceeded the threshold of 150 dwellings and on whether the *Liverpool* or *Sedgefield* method of calculating the available provision for housing was the 'correct' approach to adopt in this case; that request was refused on 30 August 2017⁸. However, the SoS subsequently directed that he should determine this appeal himself in letters dated 31 October 2017⁹. The reason for recovery was that:

... the appeal involves proposals for residential development of over 150 units or on sites of over 5 hectares, which would significantly impact on the Government's objective to secure a better balance between housing demand and supply and create high quality, sustainable, mixed and inclusive communities.

The need for Environmental Impact Assessment (EIA)

- 1.8. Although this 'urban development project' falls within the descriptions set out at paragraph 10b of Schedule 2 and exceeds the thresholds in column 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2015, the Screening Opinion issued by the Council on 7 December 2016 indicated that the effects were likely to be mainly local and, given that the site was not in a specially sensitive location, that an Environmental Statement was not necessary, bearing in mind the advice in Schedule 3 to the Regulations. Accordingly, the scheme is not EIA development and an Environmental Statement is not required. Nevertheless, the application was accompanied by the following documents¹⁰:

- Planning Statement
- Design and Access Statement
- Transport Assessment (TA)
- Flood Risk Assessment
- Archaeology Report
- Tree Survey
- Landscape and Visual Assessment (LVA)
- Ecology Assessment
- Protected Species Report
- Noise Survey and supplementary report
- Statement of Community Involvement
- Sustainability Statement
- Geo-environmental Audit

- 1.9. The appellant's evidence to the second Inquiry included updates to the Ecological Assessment, the TA, and the Sustainability Statement, as well as updates to the Heritage Assessment and Economic Benefits Statement that had been presented to the first Inquiry¹¹.

⁸ ID26

⁹ ID27

¹⁰ CD1.10-CD1.29

¹¹ APP9

*Public consultation*¹²

- 1.10. Pre-application discussion with Council officers together with statutory and non-statutory consultees preceded the application; meetings were held in December 2015 and February 2016. As a result, the intention to pursue a low **density scheme, creating a 'soft edge' to the settlement**, was endorsed. In addition, the link road through the site between Newport Road and Cranfield Road was considered to help relieve congestion at the junction beside the level crossing. Technical evidence was requested, relating to noise emissions from the Deethe Farm Industrial Estate, surface water drainage, ecological assessments and the setting of the Grade II listed Deethe Farmhouse.
- 1.11. A public consultation event (publicised in advance) was held in the Summerlin Centre, Woburn Sands on Friday 22 January 2016. This attracted 218 people. Concerns were raised about the existing junction between Cranfield Road and Newport Road, considered unsafe and subject to congestion, particularly when the level crossing was closed, and the need for traffic calming on Newport Road and Cranfield Road. There was support for the low density and the large **gardens proposed and for the possibility of an additional doctor's surgery** to ease perceived capacity problems at the existing facility.
- 1.12. Discussions with officers continued after the submission of the scheme and a revised illustrative site layout responded to specific points made at a meeting in June 2016. In addition, an LVA was undertaken, surveys of protected species carried out and the TA updated.

*The first Inspector's report*¹³

- 1.13. **The first Inspector's report** (IR) dated 2 February 2018 recommended that the appeal be allowed and planning permission granted subject to conditions. The Inspector concluded that a 5 year housing land supply (HLS) could not be demonstrated and the development plan policies pulled in both ways at a location he considered to be sustainable (IR9.48). He concluded on matters relating to the character of the landscape and surrounding area, the setting of the listed farmhouse, the traffic, car parking and facilities in Woburn Sands, housing density, ecology, and drainage (IR9.49), and considered that these matters were not sufficient to prevent a sustainable housing development from proceeding especially in the absence of a 5 year HLS (IR9.50). Weighing up the harms against the benefits, he concluded that the planning balance was firmly in favour of the proposed development (IR9.51-IR9.55).

*The SoS's decision*¹⁴

- 1.14. The SoS's **decision** letter (DL) dated 5 December 2018 agreed with the Inspector on matters such as the effect of the development on the character of the area (DL27), heritage assets (DL28), traffic, parking and facilities in Woburn Sands, ecology, and drainage (DL30). He disagreed regarding the 5 year HLS and concluded that the supply was approximately 5.9-6.2 years (DL15-18). He also disagreed regarding housing density and concluded that there was conflict with the relevant development plan policy (DL24-26).

¹² Document 11 and CD1.28

¹³ CD10.33

¹⁴ CD10.33

Weighing up the benefits of the scheme against the adverse impacts including the conflicts with the development plan (DL34-37), he disagreed with the **Inspector's recommendation and** concluded that the appeal should be dismissed.

High Court challenge

1.15. The appellant appealed to the High Court on 6 grounds. It succeeded in the case of 2 which related to the **SoS's** findings in relation to the estimated deliverable supply of housing. The Court found that the SoS had failed to provide adequate reasons in relation to the HLS figure adopted in his decision. As a consequence, the decision was quashed in a judgment¹⁵ dated 14 June 2019 and the appeal returned to the SoS for redetermination.

Re-opening of the Inquiry

1.16. The SoS wrote to parties on 16 August 2019¹⁶ confirming that the inquiry would be re-opened. He considered that there had been significant changes in circumstances since the first Inquiry which were material to the redetermination of the appeal. These included:

- The adoption of a new local plan (Plan:MK) with the associated identification of housing expansion areas;
- The announcement by Highways England, in September 2018, that corridor B (central option) had been selected as the preferred corridor for the Oxford-Cambridge Expressway; and
- Changes to national policy and guidance.

1.17. A Pre-Inquiry meeting was held on 1 November 2019 which was followed by a note¹⁷ setting out the likely main issues and how they would be addressed. At the meeting, the Council provided a note¹⁸ updating the reasons for refusal to reflect changes in national and local policy. The updated reasons are as follows:

(1) The development by virtue of its location would be contrary to spatial policies DS1 (Settlement Hierarchy), DS2 (Housing Strategy) and DS5 (Open Countryside) of Plan:MK 2016 – 2031 (adopted March 2019) and to policy WS5 of the Woburn Sands Neighbourhood Plan 2014-2026 (adopted 2014). This does not constitute sustainable development in terms of paragraph 11 of the National Planning Policy Framework (2019).

(2) Furthermore, the low density of this proposed development would not be considered sustainable given the current objectives of central government and this Council to both optimise use of land and to build both quickly and strategically, contrary to policy HN1 (Housing Mix and Density) of Plan:MK 2016 – 2031 and paragraph 122 of the National Planning Policy Framework (2019)

1.18. The second Inquiry was held on 14-17 and 21-23 January 2020. I carried out an accompanied site visit on 20 January 2020. On the same day, I also carried out unaccompanied visits to locations in the surrounding area including within

¹⁵ CD10.34

¹⁶ CD10.42

¹⁷ CD10.44

¹⁸ CD12.3

Woburn Sands as highlighted on the site visit itinerary¹⁹. The Inquiry closed in writing on 28 February 2020 once all outstanding documents, including the completed and executed Section 106 agreement, had been received.

2. The Site and Surroundings

- 2.1. The following summary of the site and its surroundings is based on Section 2 of **the first Inspector's report** and the Statement of Common Ground (SOCG)²⁰ submitted to the second Inquiry which provides a number of updates.
- 2.2. The appeal site is almost 15.2ha. It consists of about half a dozen arable and pasture fields to the east of Newport Road and to the east and west of Cranfield Road. Part of the site is designated as Grade 3a agricultural land²¹ in the Agricultural Land Classification. To the north is the former Wavendon Golf Academy which closed in 2018 and is laid out as a golf course with a formal parkland character. Further to the north of the former academy is the Grade II* listed Wavendon House and a Grade II registered park and garden of the same name which was designated on 1 November 2019. To the east is agricultural land and to the south and west are residential properties at Parkway, Hillway, Tavistock Close and Ridgeway as well as the car park of the Wyevale Garden Centre. The site wraps around the Deethe Farm Industrial Estate. Deethe Farmhouse is listed Grade II and sits in the southern corner of the estate with commercial shed-type buildings to the north.
- 2.3. Internal boundary features include hedgerow and scrub. Mature trees and hedgerows bound the Newport Road and Cranfield Road frontages and the northern boundary with the former golf academy. A hedgerow also marks the boundary with a public footpath which runs through the site between the former golf course and the industrial estate. A Group Tree Preservation Order (TPO) protects trees at the proposed access point with Newport Road. A wider Area TPO²² was designated on 8 January 2020 on land which includes the appeal site.
- 2.4. The site lies on the northern edge of Woburn Sands and beyond the development boundary for that settlement. The site is split between the parishes of Woburn Sands and Wavendon. There are neighbourhood plan areas covering both parishes although only Woburn Sands has a made neighbourhood plan. Woburn Sands is a small town with a range of shops and services including schools and a medical centre. There are bus links to Milton Keynes and a railway station on the line between Bedford and Bletchley. There are plans to upgrade the railway line as part of the east-west rail link between Cambridge and Oxford, while the area surrounding Woburn Sands is within the preferred corridor for the Oxford to Cambridge Expressway road proposal.

3. Planning Policy

- 3.1. The relevant development plan documents for this appeal now comprise Plan:MK 2016-2031 (which has replaced the Milton Keynes Local Plan 2001-2011 and the Milton Keynes Core Strategy 2013) and the Woburn Sands

¹⁹ RID14

²⁰ RID06

²¹ RID24 and LPA4

²² TPO1

Neighbourhood Plan 2014 (WSNP). There is also the Site Allocations Plan 2018 (SAP) which is of relevance for some of the disputed HLS sites (see subsequent sections of this report).

- 3.2. The National Planning Policy Framework (NPPF) was updated in February 2019 and a new section on housing supply and delivery in the Planning Practice Guidance (PPG) was published in July 2019.

*Plan: MK*²³

- 3.3. The appeal site lies adjacent to one of only 3 key settlements (Woburn Sands, Newport Pagnell and Olney) in the rural area of Milton Keynes as identified by Plan:MK. They comprise the second tier of the settlement hierarchy in Policy DS1 and are considered to be the most sustainable rural settlements taking into account their population, constraints, transport links and the capacity of services within each town. Policy DS1 states that most new development within the rural area will be concentrated within these 3 settlements.
- 3.4. Policy DS2 **sets out Plan:MK's housing strategy and seeks to deliver a** minimum of 26,500 dwellings across the Borough of Milton Keynes over the plan period. The policy states that new housing development will be focused on, and adjacent to, the existing urban area of Milton Keynes as well as the 3 key settlements. There are 13 criteria within the policy setting out how this development will be delivered.
- 3.5. Policy DS5 defines open countryside as all land outside the development boundaries defined on the Policies Map. Planning permission in the open countryside will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement, or where other policies within this plan indicate development would be appropriate.
- 3.6. Policy HN1 covers housing mix and density. Part C states that net densities of proposals for 11 or more new dwellings should balance making efficient use of land with respecting the surrounding character and context, and that higher density development will be encouraged in locations with good accessibility to facilities, that are well served by public transport, and where it can be accommodated by existing or improved infrastructure.
- 3.7. Although not mentioned in the updated reasons for refusal, Policy NE7 is **referenced in the Council's planning proof** of evidence which seeks to protect the best and most versatile agricultural land (land in grades 1, 2 and 3a meet this definition in the NPPF). In assessing proposals for greenfield sites, the policy states that the Council will take into account the economic and other benefits of such land. Development involving the loss of agricultural land should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality unless other sustainability considerations suggest otherwise.

*Woburn Sands Neighbourhood Plan*²⁴

²³ CD5.31

²⁴ CD5.3

- 3.8. A small part of the site between Hillway and Ridgway falls within the boundary of the WSNP area²⁵. Policy WS5 states that the preservation of the countryside setting, existing woodland and footpath links into the countryside is key to the future of Woburn Sands. The policy goes on to state that accordingly no extension to the current Woburn Sands Development Boundary will be permitted other than in the following exceptional circumstances:
- Plan:MK identifies a specific need for an amendment to the Development Boundary, and
 - Any proposed amendment is brought forward following full consultation with, and agreement by, Woburn Sands Town Council, and
 - The implications of any revised Development Boundary has been assessed in terms of the need to protect and maintain the character and countryside setting of Woburn Sands.
- 3.9. Although not mentioned in the original, amended or updated reasons for refusal, Policy WS6 was referenced at the second Inquiry. It states that **existing housing developments in Parklands and on the Greens' site are** expected to meet the needs for large scale housing development in Woburn Sands during the plan period. It goes on to state that additional housing in the plan area will be limited to small scale infilling between existing properties or redevelopment of existing properties other than in the following circumstances:
- The review of the MK Core Strategy [Plan:MK] identifies a specific housing need in Woburn Sands, and
 - Land proposed for development is brought forward after consultation, and agreement, with Woburn Sands Town Council, and
 - Development is of a scale and in a location that complies with the Vision and policies of the Neighbourhood Plan, and
 - Any such development is phased to take place in the latter part of the plan period in order to allow the assimilation of the increased population created by the already approved substantial developments.

National policies and guidance

- 3.10. NPPF paragraph 11 sets out a presumption in favour of sustainable development. For decision-taking this means either approving development that accords with an up to date plan without delay or where there are no relevant development plan policies or the policies which are most important for determining the application are out of date, granting permission unless one of two exceptions apply. The first is whether the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development. The second is whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

²⁵ CD12.4

- 3.11. Footnote 7 to paragraph 11 clarifies that out of date includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer set out in paragraph 73).
- 3.12. NPPF paragraph 73 states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of **five years' worth of housing against their housing requirement set** out in adopted strategic policies that are less than five years old. The supply of such sites should in addition include a buffer of 5%, 10% or 20% depending on the circumstances.
- 3.13. The NPPF glossary defines deliverable as sites for housing that should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The definition goes on to state that, in particular:
- (a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - (b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 3.14. NPPF paragraphs 122 and 123 seek to achieve appropriate densities for development within the context of making effective and efficient use of land. Paragraph 122 sets out 5 criteria that need to be taken into account including **(d) the desirability of maintaining an area's prevailing character and setting** (including residential gardens), or of promoting regeneration and change.
- 3.15. Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. It then sets out three considerations of which the first two are relevant to plan-making. The third sets out the following:
- (c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 3.16. Paragraph 170(b) recognises the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile

agricultural land. Paragraphs 193-196 deal with the impact of development on designated heritage assets.

3.17. The Housing Supply and Delivery section of the PPG sets out a number of paragraphs relating to demonstrating a 5 year HLS. This includes a paragraph²⁶ **on what constitutes a 'deliverable' housing site in the context of plan-making and decision-taking.** It states that robust and up to date evidence needs to be available. Sites in category (a) of the NPPF definition are considered deliverable in principle. Sites in category (b) require further evidence to be considered deliverable. The paragraph states that such evidence may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the **site developer(s) which confirms the developers' delivery intentions** and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

4. Planning History

4.1. Two outline planning applications were previously submitted on land forming part of the appeal site. The first (11/00936/OUT) was for the erection of 102 dwellings and associated garages/parking, creation of two new accesses and provision of open space and associated works, which was refused in July 2011. The second (12/01502/OUT) was a resubmission of the first application and was refused in October 2012. Neither refusal was appealed. Two planning applications similar to the one at appeal were submitted in January and February 2017, but were withdrawn prior to determination.

5. The Proposal²⁷

5.1. The proposal is made in outline with all matters except the means of access reserved for subsequent approval. The access arrangements are shown on drawing nos.WO1188-101 rev.PO5 and WO1188-1021 rev.PO3 indicating junction geometries with, respectively, vehicle tracking and visibility splays. Each access is shown as a simple T-junction with 2.4m x 70m visibility splays. **There are 4. Two are designed to serve a new 'spine road' running** through the proposed development from Newport Road (at a position north of Frosts landscape business and the Wyevale Garden Centre) to Cranfield Road (at a point beyond the Deethe Farm Industrial Estate and Spinney Lodge); those

²⁶ PPG reference ID: 68-007-20190722

²⁷ Based on section 3 of the first Inspector's report and section 3 of RID06

access points are shown with 9m radii and are intended to serve a road some 6.2m wide suitable to accommodate buses. The access onto Newport Road entails the removal of 2 category A trees and 2 category B trees protected by the Group TPO. It also necessitates the relocation of a badger sett. Other trees protected by the Area TPO may be affected depending on details at the reserved matters stage.

- 5.2. The 2 other access points are shown on Cranfield Road, one on the outside of the bend beyond Ridgeway and the other opposite the Deethe Farm Industrial Estate; they are also shown with 9m radii, but with carriageways only 5.5m wide, as they are mainly intended to serve discrete parts of the scheme.
- 5.3. All other matters are reserved for subsequent approval, although an illustrative layout plan and a parameters plan show how the new road between Newport Road and Cranfield Road could serve a series of residential streets created partly around cul-de-sacs taken from that new road and partly around the 2 additional junctions on to Cranfield Road. Open space would be provided along with additional boundary screening, landscape buffers, play areas and surface water attenuation ponds.
- 5.4. The Design and Access Statement indicates that the dwellings would range in type and size and include both houses and some flats. 33% of the housing would be affordable dwellings equating to 67 units out of the proposed maximum of 203 units (25% would be affordable rented and 8% shared ownership).
- 5.5. The illustrative plans **show the potential site for a doctor's surgery** which would be provided if NHS England or the local Clinical Commissioning Group indicate that they would be willing to take advantage of such provision. It would either be a standalone facility or a satellite building for the existing surgery in Woburn Sands which has limited room to expand. Should the provision not be taken up, then 3 homes would be provided instead up to the maximum 203. This matter is addressed in the S106 agreement²⁸ and includes a financial contribution either towards the provision of the on-site surgery or expanding capacity at the nearest surgery serving the development. The S106 agreement also makes a range of financial contributions towards matters including education, open space, transport, community assets and social infrastructure. It also secures the provision of affordable housing on site.
- 5.6. Suggested conditions²⁹ are intended to ensure that the scheme would be implemented as intended and that the reserved matters and other details (including hard and soft landscaping and boundary treatments) would be submitted to the local planning authority for approval. In addition, foul and surface water drainage systems would be installed and controlled: a Construction Management Plan (including hours of operation) would be devised and implemented: a Landscape and Ecological Management Plan, including measures to safeguard protected species, would be prepared: a Travel Plan would be instigated: further archaeological investigations would be **undertaken: the provision of 'green infrastructure', the retention of trees and the creation of new pedestrian and cycle facilities would be secured.**

²⁸ RID37

²⁹ Section A2 of RID06

6. Other Agreed Facts

6.1. The main SOCG³⁰ sets out a number of agreed matters including:

- The proposal would not have an adverse effect of facilities and services within Woburn Sands;
- The proposed highway junctions onto Newport Road and Cranfield Road would have sufficient capacity to serve the development and additional through traffic and there are no objections to the junctions in highway terms;
- The junctions will remain well within capacity and will not create any queuing or congestion issues on the existing highway network;
- The effect on the listed Deethe Farmhouse would result in a low level of less than substantial harm;
- There are no national landscape designations that require consideration, effects on the locally designated area of attractive landscape will be negligible **and the site and adjacent areas are not 'valued landscapes'** in the context of NPPF paragraph 170;
- The landscape impacts would be limited to the site and immediately adjacent fields and would carry limited weight against the proposal. It is agreed that the same approach should apply at the current Inquiry;
- The proposal should not be refused because of the Oxford-Cambridge Expressway or on the grounds of prematurity;
- The proposal is acceptable with regard to surface water drainage and matters of detailed design can be addressed via planning conditions;
- Matters relating to noise from the adjacent industrial estate can be addressed via planning condition; and
- Matters relating to biodiversity and protected species are not an issue for this appeal and can be addressed via planning conditions and reserved matters applications.

6.2. An addendum to the SOCG³¹ was received after the inquiry addressing the recently designated Area TPO. It confirms that:

- The TPO covers a wide area including the appeal site. It is directed to a wide area rather than in relation to individual trees or groups of trees.
- It is subject to a 28 day legal challenge period up to 5 February 2020 and will remain in effect for 6 months up to 8 July 2020 and thereafter if it is confirmed or replaced in the meantime.
- It is agreed that this new TPO does not materially alter the planning evidence or planning balance as presented by each party

³⁰ RID06

³¹ RID35

- Should outline permission be granted, this would allow for the removal of trees within the area covered by the TPO once details have been fully agreed at the reserved matters stage.
- The TPO protects trees on site until the implementation of the planning permission.

6.3. There is also a SOCG relating to housing land supply³², which sets out the following agreed matters:

- Plan:MK provides the basis for the calculation of the five-year housing land requirement. This states that there is a minimum requirement of 1,767 dwellings a year in the period April 2016 to March 2031;
- There have been 4,529 net completions in the Plan:MK plan period to 31 March 2019;
- There is a backlog of 772 dwellings as at 1 April 2019;
- All of this backlog should be met in the next 5 years (the Sedgefield method); and
- A 5% buffer should be applied to both the annual requirement and the backlog based on the published 2018 Housing Delivery Test results (February 2019).

6.4. The areas of disagreement relating to housing land supply are as follows:

- Whether or not a 5 year supply of deliverable housing sites can be demonstrated
- The timescale of the assessment (1 April or 1 October 2019)
- The timing of meeting the definition of deliverable
- The definition of deliverable
- Forecast completions
- The "optimism **bias**" (discounting dwellings from the supply)

³² SOCG1

7. The Case for the Appellant³³

The previous decision letter and the first Inspector's report

- 7.1. The Council asserted that the previous SoS decision letter (DL) remained a material consideration relying on *Davison v Elmbridge BC* [2019] EWHC 1409³⁴. That judgment is on appeal to the Court of Appeal and relates to a **planning committee's decision not an** appeal decision which is an important distinction. The most recent judgment in relation to a challenge against an appeal decision held that the quashed decision is of no legal effect and should not be sub-divided in respect of those matters on which it was quashed: *R (West Lancashire BC) v Secretary of State for Communities and Local Government* [2017] EWHC 3451 (Admin), [27]-[38].
- 7.2. The Council in opening accepted that the SoS DL was not material in terms of HLS and conflict with expired Policies S10 and H8 (location and density respectively) due to the court order and change in circumstances including the adoption of Plan:MK. The Council identified the **DL's finding of failure to accord** with WSNP Policy WS5 was relevant but made clear that the weight to be accorded to that policy would need to be considered afresh. The appellant accepts there is policy conflict but there remains dispute about datedness.
- 7.3. The Council confirmed that the DL findings on landscape and character, heritage, traffic, ecology and drainage remained relevant where the DL simply **endorses the conclusions of the first Inspector's report**.
- 7.4. The only basis upon which the Council maintains the SoS is bound by consistency as to both policy conflict and weight is DL paragraph 26 (and the finding that the proposals were contrary to NPPF paragraph 122 and 123)³⁵. That is contentious and fundamentally incorrect. The approach does not correctly reflect the position that a quashed DL is of no legal effect. It ignores important changes in circumstances in the evidence before the Inquiry including:
- (a) **the Appellant's updated evidence at this inquiry as to the actual net density of the scheme and the changes in housing mix;**
 - (b) the changes to the development plan following adoption of Plan:MK; and
 - (c) **the Council's concession through the evidence of its planning witness³⁶ that density is a matter to be addressed at the reserved matters stage in the context of layout and does not provide a basis for refusal.**

The Development Plan

Plan:MK

- 7.5. The Appellant acknowledges that the development is in conflict with Policies DS1, DS2 and DS5 of Plan:MK³⁷. However, it is important to examine the extent of the conflict and how precisely it arises. The development is contrary

³³ Largely taken from the appellant's closing submissions RID33

³⁴ RID03

³⁵ RID02, paragraph 8(d)(iii)

³⁶ Cross-examination and re-examination of Niko Grigoropoulos on Day 5

³⁷ APP8 page 7 para 3.1

to the terminology of the policies, given their reference to Policy DS5. DS5 is a counterpart policy. Where a proposal conflicts with DS5, it will be contrary to DS1 and DS2. However, it accords with the strategy underlying DS1 and DS2 insofar as directing development to the three key settlements in the rural area **as locations that the Council has "chosen for development"**³⁸.

- 7.6. Woburn Sands is the only key settlement to have its own train station. Plan:MK does not identify any constraint on housing delivery or place any cap on the number of dwellings to be located at Woburn Sands. The first Inspector found Woburn Sands to be a sustainable location for growth (see IR9.48). The WSNP was adopted more than 5 years ago and 3 years prior to Plan:MK. It does not make any allocations and has not been reviewed.
- 7.7. The settlement boundary is tightly constrained. The application of and weight accorded to Policies DS1, DS2 and DS5 must yield to the assessment of HLS. The Council accepted³⁹ that it was to Woburn Sands as a key settlement that development should go in the absence of a 5 year HLS.
- 7.8. The Council has identified conflict with Policies HN1 and NE7 of Plan:MK but confirmed that all other policies weighed in support (including Policy HN2 in respect of affordable housing and Policy EH5 in respect of health facilities) or could be addressed through reserved matters.

Woburn Sands Neighbourhood Plan

- 7.9. It is accepted that the development conflicts with Policy WS5 as none of the named exceptional circumstances are presently met. The weight to be accorded to the policy must however reflect the extent to which the policy remains in accordance with the NPPF and up-to-date, for the purposes of NPPF paragraph 213.
- 7.10. The WSNP was adopted comparatively early in July 2014 and was assessed for general conformity against a now expired Local Plan backdrop and the 2012 version of the NPPF. Policy WS5 was identified at appeal as creating an unacceptable constraint on growth in circumstances where there was no 5 year HLS. It was accorded very little weight in the Frost appeal⁴⁰ and the first Inspector for this appeal stated it was contrary to the advice in the NPPF (see IR9.20).
- 7.11. The policy is not consistent with the NPPF including the second test which requires the agreement of the Town Council. This was added after the examination without the recommendation of the examiner or any further assessment⁴¹. The policy also seeks to protect the countryside for its own sake which is at odds with the more balanced approach in NPPF paragraph 170(b).
- 7.12. The WSNP makes no provision for an up to date housing requirement in line with NPPF paragraph 65 and 66 and contains no allocations or policies to provide for housing. The lack of WSNP review means that the obvious defects of Policy WS5 have not been scrutinised. The Council is incorrect to say that

³⁸ CD5.31 Glossary on page 286

³⁹ Cross-examination of Niko Grigoropoulos on Day 5

⁴⁰ CD6.6

⁴¹ CD5.17 paragraph 7.6.12 and recommendation 2B

the policy has been given a new lease of life by Plan:MK as the Plan Inspector could not and did not make any finding on the soundness of this policy.

- 7.13. **The Council's planning witness accepted no conflict with Policy WS6 in cross-examination but the Council's advocate seemed to withdraw that concession in cross-examination of the appellant's planning witness.** The policy is parasitic on WS5 and equally inconsistent with the NPPF, requiring the agreement of the Town Council and seeking to delay development to the end of the plan period. This reduces the weight to be accorded to it.
- 7.14. Irrespective of the 5 year HLS position, Policies WS5 and WS6 are out of date for at least two reasons: (1) their wording is highly restrictive and fails to accord with the NPPF and (2) the WSNP was not prepared using an up to date housing requirement and makes no housing allocations.

Housing Land Supply

Overview

- 7.15. The SOCG on HLS sets out a number of agreed matters in terms of housing requirement, net completions, the backlog, the use of Sedgefield, the buffer and the resulting requirement.
- 7.16. Plan:MK was assessed under the tests contained in the old 2012 NPPF and the Plan Inspector made no findings as to deliverability under paragraph 73 and glossary definition of the 2019 NPPF. The Council's HLS witness accepted that **the Plan Inspector's Report does not help** in determining whether the Council can demonstrate a 5 year HLS now.
- 7.17. The appellant has identified that the deliverable HLS at the base date of 1 April 2019 would be 3.55 years (7,161 dwellings) and at the base date of 1 October 2019 would be 3.76 years (7,579 dwellings).
- 7.18. **In comparison, the Council's respective figures are understood to be** 6.41 years (12,931 dwellings) for the 1 April 2019 base date and 6.91 years (13,949 dwellings) for the 1 October 2019 base date
- 7.19. Deductions of 2,844 dwellings against the 1 April base date and 3,858 dwellings against the 1 October base date would result in the Council having less than a 5 year HLS.
- 7.20. The appellant submits that a deduction of that scale is justified on three site-specific bases. Firstly, that sites with detailed permission (category (a) in the NPPF definition) require deductions to reflect unrealistic build-out rates. Secondly that sites with outline permissions or allocations (category (b) in the definition) require deductions or removal to reflect the absence of clear evidence to demonstrate deliverability at the base date. Thirdly, other sites which do not fall within either category (principally prior notification sites under Class O) require removal to reflect the absence of clear evidence to demonstrate deliverability at the base date.

Deliverability

- 7.21. The Council refer to the judgments in *St Modwen*⁴² as to the distinction between certainty and a realistic prospect. That latter judgment was considered further and qualified in *Babergh*⁴³. The revised NPPF in 2018 and 2019 altered the definition of deliverable in two key respects. Firstly, the requirement to demonstrate clear evidence and secondly the use of closed categories in the definition with the burden of proof distributed accordingly. These changes have been described as ensuring a stricter approach by Inspectors⁴⁴. *Babergh* is more recent than *St Modwen*.
- 7.22. A site specific approach must be applied to an assessment of deliverability to comply with the NPPF. The SoS DL on this case was quashed based on the failure to provide site specific analysis on any reasons for the final HLS figure. It is permissible to consider the broader context of HLS in terms of the size and type of sites included, historic rates of delivery and the accuracy of past forecasts, but this cannot replace site specific analysis. In this respect, the **Council states that their historic use of a generic "optimism bias" no longer** meets the requirements of the NPPF nor the PPG⁴⁵. That said, the Council continue to use it and adopt that position in the context of this appeal.

The base date

- 7.23. **The appellant's** HLS witness explained why it is essential that the evidential position ('clear evidence') is assessed by looking to what existed at the base date. **A 'backfilled' approach whereby a site was simply deemed to be** deliverable and evidence then adduced and accumulated over the course of the year was not methodically sound and not compliant with the NPPF or PPG. There is Inspectorial authority on this point from the Woolpit decision⁴⁶. It is possible to take into account information that has arisen after the base date, but only where the site passed the test of deliverability at the base date⁴⁷. This was the approach of the last decision within the Milton Keynes area at Castlethorpe Road⁴⁸. The earlier Globe decision cited Woolpit but appeared not to apply it, notably omitting to set out the state of the evidence at the base date for respective sites.
- 7.24. The Council has further cited the Colchester Road decision⁴⁹, but the example cited by the Inspector of a separate full permission being excluded, is not replicated in the instant case. Moreover, that Inspector in disagreeing with Woolpit in respect of new permissions again did not address the specific problem of completions.
- 7.25. In assessing the intention of the NPPF, it is instructive to consider the position of Annual Position Statements requiring research to be complete prior to the necessary consultation with stakeholders which must take place between notification on 1 April and submission on 31 July of the given year. It is

⁴² CD7.1 [2016] EWHC 968 (Admin) and CD7.6 [2017] EWCA Civ 1643

⁴³ RID09 [2019] EWCA Civ 2200 paragraphs 45-50

⁴⁴ CD6.18 for example

⁴⁵ LPA1 page 22 para 4.54

⁴⁶ CD6.16 paragraphs 67 and 70-79

⁴⁷ CD6.13, CD6.14 and CD6.15

⁴⁸ CD6.18 paragraphs 58-61 and 65

⁴⁹ CD6.22, paragraph 63

therefore entirely practical and consistent with the intention of national policy to ensure that the evidence base is assembled prior to a 1 April base date, including the draft written agreements. The appellant referred to two examples from Mid Suffolk⁵⁰ and Babergh⁵¹ District Councils which respectively itemise the extent of prior consultation and evidence collection, resulting in the production of Memoranda of Understanding (MOU).

- 7.26. The fundamental principle at stake is that of robustness in the evidence base to give effect to the policy imperative of boosting the supply of housing. This can only be ensured by looking to the full 5 year period (not a shortened 4 ¼ period) and by ensuring full transparency on the part of the Council when drawing up its Annual Monitoring Report. **The Council's HLS witness accepted** that none of the evidence provided in its June 2019 HLS Statement contained documentary evidence at the base date of 1 April 2019. They either substantially pre-dated 1 April 2019 (based on Plan:MK information) or substantially post-dated it (such as the proformas). No amount of chasing of proformas or sense checking could repair the fundamental deficit of evidence at the base date. **The appellant disputes the Council's claim** that the appellant promotes an artificial two stage approach as one stage should suffice.
- 7.27. It is for this reason that the appellant advances an updated base date to 1 October 2019 to allow the most up to date evidence to be adduced, but only in a manner that reflects the level of completions that have occurred since 1 April 2019.

Proformas

- 7.28. **The Council's proformas are not written** agreements in line with the PPG ID68-007. They present the trajectory with a simple box to check without identifying the extent of the evidence of progress or testing the build out rate. Supporting information by way of covering emails was often sparse. As such, the Council has had to rely on **variety of updates from its witness' proof to oral additions in** the roundtable session. This is wholly inconsistent with national policy and does not reflect clear evidence to reflect the position as at the base date.

Build-out rates

- 7.29. The evidence of the **appellant's HLS witness** sets out the national perspective⁵² which identified the highest build-out rates of 268dpa averaged over 5 years at the Eastern Expansion Area in Milton Keynes (Broughton Gate and Brooklands). Based on the local **experience of the appellant's HLS witness**, any rates significantly in excess of this figure should be treated with scepticism.

Public ownership of land

- 7.30. Another key obstacle for the Council has been the extent to which it relies on sites in public ownership including the Milton Keynes Development Partnership (MKDP), the Milton Keynes Community Foundation and Homes England. The reason for delays in releasing sites are myriad. The proformas submitted by the Council were subject to assessment by a body that included officers of the

⁵⁰ RID10

⁵¹ RID08

⁵² CD11.1 and APP3 appendix 1 paragraphs A1.18-A1.22

Council and MKDP. Contrary to **the Council's advocate's** suggestion that this impugned their professional judgment, there was an inevitable circularity in the proforma assessments submitted by these bodies, unjustifiably reinforcing misplaced optimism as to delivery rates.

Past forecasts

- 7.31. The Council has had historic difficulties in the accuracy of its forecasting. When tabulating actual completions against forecasts⁵³, there is an under-delivery against forecasts of 28-30%. Current and past trajectories have failed to be met. Historic rates are instructive in identifying persistent trends and providing a sense check with long-range date.
- 7.32. Inspectors have commented **on the way the Council's supply assumes very sharp increases in delivery beyond those experienced either locally or nationally**⁵⁴. In response to this, the Council have sought to rely on recent short-term uplifts in completion rates to suggest that there has been a change of direction. Such data is too short-term and too limited in any supporting analysis to justify any conclusion that there has been improvement in their forecasting exercise. There is no evidence that Plan:MK is responsible for recent uplift in delivery. Peaks in development activity have historically been attributable to apartment blocks. This provides limited assistance in respect of how sharp and continuing increases can occur on strategic sites.

Consistency with previous decisions in Milton Keynes

- 7.33. The Castlethorpe Road decision, being the most recent and having taken into account the earlier Globe decision remains the most helpful reference point for the Inspector and SoS. The legal challenge to the Castlethorpe Road decision was unsuccessful. The decision sets out robust approach to individual sites at paragraphs 58-60 identifying longstanding delays to delivery and an overall absence of strong evidence. The Inspector in paragraph 63 made clear that he stopped halfway through looking at sites as it was already evident that the Council did not have a 5 year HLS.

*Individual site analysis*⁵⁵

- 7.34. **The appellant's analysis is based on the evidence of its HLS witness** in his proof (Appendix 3) and rebuttal (Appendices 3 and 3a)⁵⁶. The errata document⁵⁷ updates the evidence in several respects following the roundtable session.

Site 1: Brooklands (deduct 232 units for 1 April or 267 units for 1 October)

- 7.35. Sites with detailed permission **but Council's rate of delivery is excessive**, assuming a sharp uplift in delivery from 182 dwellings in 2019/20 to 347 dwellings in the following year with only 2 developers on site across 7 parcels. This would be substantially higher than the highest figures hitherto achieved (268dpa across 12 parcels). Reduce delivery from 222dpa to 175dpa (April) or 168dpa (October).

⁵³ APP3 appendix 2, table 2 and table 3

⁵⁴ CD5.32 paragraph 145 and CD10.33 paragraph 9.9

⁵⁵ **The appellant's closing submissions sets out its case for each site in more detail**

⁵⁶ APP3, 4 and 6

⁵⁷ RID20

Housing density

- 7.97. At this Inquiry, the appellant has made clear that the density figure should be assessed at 20.3 dwellings per hectare (dph) applying a net density approach **that subtracts the area's listed in the planning witness' proof**⁵⁹. That approach reflects the absence of any statutory definition or any extant policy or guidance. Changes to the housing mix would increase density in respect of habitable rooms per hectare⁶⁰.
- 7.98. **The Council's case at the first Inquiry sought to prolong the** initial objection on the basis of Policy H8 of the Local Plan 2005 which looked for a density of 35dph for locations like Woburn Sands. The first Inspector found no substance in this point in his paragraphs IR9.43 and IR9.45. The SoS DL paragraphs 24-26 referred consistently to conflict with Policy H8. The SoS referred only in DL paragraph 24 to NPPF paragraphs 122-123 in assessing the accordance of the policy with NPPF, notably identifying its use of a range of average net densities.
- 7.99. The development plan position and national policy position have both moved on markedly since the original Inquiry with the expiry of Policy H8. The policy framework for density is now Policy HN1(c) with contextual support from Policy SD1 and D1. Policy HN1 conforms with NPPF paragraph 122 and was found sound by the Plan:MK Inspector albeit in the context of NPPF 2012.
- 7.100. The correct approach to assessing acceptability of density is to assess those areas immediately adjacent to the development, not an arbitrary wider **area comprising the whole settlement. The appellant's evidence carries out** a systematic calculation⁶¹ of density of area surrounding the site with regard to Policy HN1(c) and NPPF paragraph 122(d) in particular. **The Council's planning witness** accepted in cross-examination that he had undertaken no calculation of density of his own, had relied **on the Nampak Inspector's finding of density**, and had not identified any minimum density. His 27dph represented one variant of an acceptable scheme and he considered the acceptable number of dwellings on the site may be higher or lower than 203. He also accepted that NPPF paragraph 123(a) is a plan-making provision and 123(c) is to be read in the broader context of paragraph 122.
- 7.101. **The Council's planning witness conceded that the layout of the** development was a reserved matter and one the Council could control in due course. Article 2 of the Town and Country Planning (Development Management **Procedure) Order 2015 defines "layout": "means the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development".**
- 7.102. **The Council's suggestion that a Council cannot control density at the** reserved matters stage relies on the solitary basis of a single paragraph of the **Planning Encyclopedia's section 3B-2200.5** citing *R v Newbury DC Ex p Chieveley Parish Council* [1998] PLCR 51⁶². The Council has not explained

⁵⁹ APP8 paragraph 5.5⁶⁰ APP8 paragraph 5.6-5.8⁶¹ APP10 appendices 2-6, especially appendix 2 which focuses on the built up area of Woburn Sands only⁶² RID23

would have to be something distinct and material about this site in order to suggest that its green field location would render it unsustainable. That was certainly not the view of officers in their report recommending approval and it is freely recognised by the Council that there is no landscape or similar argument to support objection to the appeal site here.

Highways/Traffic benefits

- 7.118. There are highways and transportation benefits, by providing additional flexibility in the local network and an alternative to the existing Newport Rd / Cranfield Rd junction. These can be classified as both environmental and social benefits. The proposal would also help to contribute towards sustainable patterns of development and help to counteract the increasing levels of commuting which can be created by an imbalance of homes and jobs.

Summary on benefits

- 7.119. The proposed development is one which, by reason of its location and accessibility to a range of services, facilities and transport links, and having regard to the three dimensions set out in the NPPF, is sustainable development which properly benefits from the presumption in its favour. Even in circumstances (though not here) where an Inspector were to conclude that the Council was able to demonstrate a 5 year HLS, the sustainability and other advantages constituting material considerations in this case would be sufficient to justify the grant of consent.

Conclusions

- 7.120. The appeal proposal represents sustainable development adjacent to a settlement which is identified in Plan:MK as being a key settlement and which contains not only a wide range of service and facilities but also a railway station. The Council does not have a 5 year HLS and that the shortfall in both market and affordable housing is longstanding, acute and continuing.
- 7.121. The proposed development gives rise to substantial benefits which are not outweighed by any of the alleged detrimental impacts and is consistent with the presumption in favour of sustainable development. It is therefore respectfully submitted that the appeal should be upheld and planning permission ought to be granted.

8. The Case for Milton Keynes Council⁷⁴

Introduction

- 8.1. The Council submits that this appeal should be dismissed. In its evidence to this inquiry and questions in cross-examination, the appellant has demonstrated an obsession with process, an interpretative approach which is contrary to the plain words of local and national policy, and a selective approach to the evidence which ignores that which does not support its case. **By contrast, the Council's approach has been straightforward, consistent with national policy, and should be preferred**

Previous Decision Letter (DL)

- 8.2. The DL is a material consideration in the redetermination of this appeal, notwithstanding the fact that it was quashed by the High Court: see *R. (Davison) v Elmbridge Borough Council* [2019] EWHC 1409 (Admin)⁷⁵. This is to give effect to the well-established principle of consistency in decision making. In *Davison*, the judge gave specific guidance on the application of consistency to a quashed decision as follows:
- (a) The principle of consistency is not limited to the formal decision but extends to the reasoning underlying the decision.
 - (b) Of itself, a decision quashed by the Courts is incapable of having any legal effect on the rights and duties of the parties. In the planning context, the subsequent decision maker is not bound by the quashed decision and starts afresh taking into account the development plan and other material considerations.
 - (c) However, the previously quashed decision is capable in law of being a material consideration. Whether, and to what extent, the decision maker is required to take the previously quashed decision into account is a matter of judgment of the decision maker reviewable on public law grounds. A failure to take into account a previously quashed decision will be unlawful if no reasonable decision maker could have failed to take it into account.
 - (d) The decision maker may need to analyse the basis on which the previous decision was quashed and take into account the parts of the decision unaffected by the quashing.
 - (e) The greater the apparent inconsistency between decisions the more the need for an explanation of the position
- 8.3. Applying these principles, the Council submits:
- (a) The DL is a material consideration in the present case. No reasonable decision maker could fail to take the DL into account given the obvious relevance to the issues in dispute. However, the DL does not bind the decision maker who must start afresh, taking into account the

⁷⁴ Largely taken from the Council's closing submissions RID34

⁷⁵ Insofar as the Appellant may seek to rely on *West Lancashire v SSCLG* [2017] EWHC 3451 as establishing a different approach, *Davison* is to be preferred given that it expressly considered *West Lancashire*.

development plan and other material considerations, of which the DL is one.

- (b) The DL was quashed because the Secretary of State failed to give adequate reasons for concluding that the Council could demonstrate a 5 year **HLS**. **Accordingly, the Secretary of State's conclusions (and reasoning)** on all matters unrelated to 5 year HLS were not impugned by the High Court.
- (c) Notwithstanding **the fact that the SoS's conclusions on these matters** was not impugned, it is necessary to consider whether those conclusions remain relevant, and if so, whether they hold good, taking into account any changes in circumstances that may have arisen since the **SoS's** decision

8.4. **In respect of the Secretary of State's principal conclusions, the Council's position is that:**

- (a) 5 year HLS: The conclusion at DL paragraph 18 that the Council could demonstrate a 5 year HLS formed the basis on which the DL was quashed. Accordingly, no weight can be given to this conclusion and the issue must be considered afresh by reference to the new evidence now presented at this Inquiry.
- (b) Location of site: The conclusion at DL paragraph 19 that the development fails to accord with Policy WS5 of the WSNP is relevant and unaffected by the quashing of the DL. However, given the changes to the development plan since the DL was issued, the conclusion that the development was contrary to saved local plan policy S10 is no longer relevant. Further, given the changes to the development plan, it is necessary to consider afresh the weight to be afforded to the conflict with Policy WS5.
- (c) Housing density: The conclusion at DL paragraph 26 that the development fails to accord with NPPF 2018 paragraphs 122–123 is relevant and holds good given the similarity with the relevant paragraphs in the NPPF 2019. However, given the changes to the development plan since the DL was issued, the conclusion that the development was contrary to Policy H8 is no longer relevant.
- (d) Character of the area: The conclusion at DL paragraph 27 **that "the significant visual and landscape effects of the scheme would be very local, while beyond those immediate surroundings, the effects would be very limited" is relevant and holds good as there has been no material change of circumstances.**
- (e) Heritage: The conclusion at DL paragraph 28 that there would be less than substantial harm to Deethe Farmhouse is relevant and holds good as there has been no material change of circumstances.
- (f) Benefits of the scheme: The conclusion at DL paragraph 29 that the benefits of the scheme comprise affordable housing, temporary construction employment and secondary employment is relevant and holds good. However, it is necessary to consider afresh the weight to be

afforded to these benefits given the changed housing and economic environments.

- (g) Other matters: The conclusion at DL paragraph 30 that matters relating to traffic and parking, the impact of the development on the facilities of the town, and ecology and drainage, do not weigh against the proposal is relevant and holds good as there has been no material change of circumstances.

- 8.5. It is necessary to consider afresh the conclusions in respect of planning conditions and obligations and the planning balance given changes to the development plan and amendments to both conditions and obligations.

Housing Land Supply

The general approach to the assessment of HLS at this appeal

- 8.6. There is a need to adopt a proportionate and realistic approach to the assessment of evidence at an appeal compared to local plan examination as acknowledged by the Inspector at the Castlethorpe Road appeal⁷⁶. The policy imperative of demonstrating a 5 year HLS in NPPF paragraph 73 and the consequences of not being able to in terms of NPPF paragraph 11 is to ensure that there is an adequate supply of housing land. This is clear from NPPF paragraph 59. Contrary to the approach of the appellant, the assessment of 5 year HLS is concerned with the endpoint and a sufficient supply of deliverable land, not with the assessment process. There is a need for good planning judgment.
- 8.7. **The appellant's approach to the assessment of deliverability invites the** decision-maker to ignore evidence which is obviously material to the assessment of realistic prospects. It is well established that policy cannot lawfully make immaterial that which is material⁷⁷. The Appellant ignores this, and this is one of many reasons why its approach is wrong in law.
- 8.8. **The Council's 5 year HLS must be viewed in** the context of the recently adopted Plan:MK, which has brought about a robust supply and resulted in dramatic improvements in housing delivery. Since adoption in March 2019, the Council has achieved its annual delivery requirement in 2018/19 for the first time since 2007/08 consistent with the continual year on year improvement over the first 3 years of Plan:MK. In quarters 1-3 of 2019/20, the Council has delivered 92% of its annual requirement such that it is near certain that it will meet its annual delivery requirement again for the second consecutive year⁷⁸. The number of units under construction at the end of quarter 2 of 2019/20 was the highest number since June 2008 and quarter 3 only marginally lower. The first 3 quarters of 2019/20 is the first time since at least 2007/08 that the Council has recorded over 2000 units under construction for 3 consecutive quarters.

⁷⁶ CD6.18 paragraph 51 [the Council's closing submission refer to this appeal as 'Hanslope', but for consistency this report has used the same address used by the appellant]

⁷⁷ See *Gransden & Co. Ltd. and Another v Secretary of State for the Environment* (1987) 54 P. & C.R. 86 per Woolf J (as he then was) at 94.

⁷⁸ LPA1 table 5.1 and RID07

- 8.9. The Plan:MK Inspector confirmed the Council has a clear and robust roadmap to delivering housing and was satisfied with its housing trajectory, with special circumstances for significantly higher delivery over next few years, significant number of small and medium sites and the risk of non-delivery minimal⁷⁹. The Council submits that the change in the NPPF definition of deliverable does not affect these conclusions as they go to the underlying approach of the Council and the underlying circumstances of the local area.

Other recent appeal decisions dealing with 5 year HLS

- 8.10. Both the Castlethorpe Road and the Globe appeal decisions⁸⁰ are material considerations, but neither is binding on the decision maker. Given the conflicting conclusions on HLS, the decision maker will need to disagree with at least one and give reasons. Neither decision is more lawful than the other and their planning judgments have not been challenged. The differences between the appeals relate to the different evidence presented to each appeal and the different manner in which the evidence was presented. The fact that more time was spent on site by site analysis at the hearing for the Castlethorpe Road appeal does not make it a more considered decision. The evidence was presented in advance for the Globe hearing and there was only one appellant. The HLS evidence at the Globe hearing was more up to date and was presented earlier on. While this might mean the Globe decision should be preferred on this basis, there is still a need to reach a fresh judgment for this appeal based on the evidence before this Inquiry.
- 8.11. Both appeal decisions considered the most up to date evidence like this appeal. Both decisions noted the improving housing completions. The Castlethorpe decision dismissed **criticism of the Council's proformas**. This Inquiry has the **benefit of the Council's note**⁸¹ explaining the proforma process and that respondents did amend build out rates where necessary. A statement from a developer would provide no greater certainty of delivery. The evidence presented by the appellant from Mid Suffolk District Council⁸² accepts an email confirmation to support build out rates.
- 8.12. The Castlethorpe Road decision applies an optimism bias (OB) using a midpoint between the Council and appellants (paragraph 62). It is important to note that the Council and appellants were referring to two different things when using the term OB: the Council was referring to a lapse rate while the appellants were referring to an adjustment for alleged inaccuracies in the 5 year HLS assessment. The alleged inaccuracy was the discrepancy between the **Council's previous assessments of HLS and the number of homes delivered**. The midpoint applied by the Inspector was not 17.5% but a broader approach and the Council would have been able to demonstrate a 5 year HLS otherwise.
- 8.13. The Castlethorpe Road conclusion that it was not particularly apparent that the Council had reduced its calculations of housing land supply to reflect the revised definition of deliverable in the NPPF no longer holds good as the Council has given clear evidence⁸³ to this Inquiry of the approach and

⁷⁹ CD5.32 paragraphs 136, 145 and 152

⁸⁰ CD6.18 and CD6.17 respectively

⁸¹ RID13

⁸² RID15

⁸³ LPA2 appendix 2, section 2

methodology followed. Moreover, the Council has discounted sites from the Plan:MK 5 year HLS due to the new definition of deliverable⁸⁴.

Timescale of the evidence

- 8.14. There is dispute between the parties as to the use of evidence which post-dates the base date of 1 April 2019 to assess deliverability. This is a matter of principle which falls to be determined by interpreting national policy and is not **an issue specific to the facts of the case. The Council's position** is that the calculation of 5 year HLS should not introduce new sites granted permission after 1 April 2019 which were not identified as part of the supply at 1 April in **Council's June 2019 HLS assessment**. Moreover, regard should be had to all of the evidence presented to this inquiry even it was created after 1 April or relates to events which postdate 1 April. The assessment needs to ask a simple question in respect of each site – does the evidence presented to this inquiry demonstrate that the site is deliverable in the five-year period 1 April 2019 – 31 March 2024.
- 8.15. The appellant advocated an artificial two stage approach. Firstly, to consider, by reference only to evidence which predates 1 April (either because it was created before that date or because it was created after that date but referable back to matters known before that date), whether the site was deliverable as at 1 April. Secondly, to consider whether the conclusion reached at the first stage holds good today by reference to other matters since 1 April. The Council submits this is wrong and should be rejected for the following reasons.
- 8.16. Firstly, it is an approach that has no basis in the NPPF or PPG. Reference in **paragraph 73 to a minimum of 5 years' worth of housing is simply an** expression of the need for the supply to cover at least a 5 year period. Reliance on the PPG paragraph 68-001-20190722 is misplaced **as 'next five years' operates as a contrast to 'last 3 years' to illustrate difference between** retrospective Housing Delivery Test and prospective calculation of 5 year HLS. It does not impose an evidential cut-off date. The appellant accepts that the **base date for assessment may be a date which has passed such that 'next' is** not imbued with any special meaning. There is no basis for only considering evidence prior to the base date and no basis for a two stage approach.
- 8.17. Secondly, the PPG approach accords with the Council when considering the provisions relating to preparation of an Annual Position Statement (APS)⁸⁵ where the base date is 1 April and a local planning authority has until 31 July to prepare and consult on its APS before submission to PINS and PINS issues its recommendation by October. This allows for stakeholders to agree or disagree with evidence to allow robust challenge and reasoned conclusion on deliverability which is then assessed by PINS.
- 8.18. Thirdly, neither Woolpit nor Darnall School Lane decisions⁸⁶ support the **appellant's approach. The former** discounts sites not identified at the base date from the assessment which the Council follows in its approach. The latter considered information after the base date where it was relevant to identified sites with no artificial cut-off date for evidence.

⁸⁴ RID19

⁸⁵ PPG ID: 68-012-20190722, ID: 68-013-20190722, ID: 68-015-20190722

⁸⁶ CD6.16 and CD6.14/6.15 respectively

- 8.19. **Fourthly, the appellant's approach is impractical and seeks to create an artificial process.** An HLS assessment requires understanding of actual completions which cannot be known until after the base date. The Mid Suffolk and Babergh HLS assessments illustrate this reality⁸⁷. Both refer to MOUs/SOCGs agreed after base date; these may support evidence but can only mean there was sufficient clear evidence without them. The MOUs contained matters post-dating the base date that were taken into account in calculating 5 year HLS such as build out rates⁸⁸. The assessment of deliverability requires consideration of how many homes are deliverable and not simply that the site is deliverable⁸⁹. There is no basis in policy or logic to impose artificial time restrictions on the assessment of deliverability but not the other elements of the 5 year HLS assessment.
- 8.20. Fifthly, where an APS is not used, the PPG is clear that HLS should be demonstrated using the latest available evidence and up to date evidence⁹⁰. **The Council's approach** is consistent with this. The appellant seeks to disaggregate evidence so that there is a threshold test at first stage which omits the most recent evidence as it is limited only to evidence which predates the base date. The consequence is to invite the decision maker to disregard obviously material evidence in the assessment of whether there is a realistic prospect that a particular site is deliverable.
- 8.21. **Sixthly, the Council's approach is consistent with** the Colchester Road decision⁹¹ regarding evidence after the base date, the Globe decision⁹² regarding the use of proformas after 1 April base date, and the Castlethorpe Road decision regarding the use of proformas⁹³.
- 8.22. **The appellant's approach seeks to create an obstacle course for local planning** authorities to negotiate every time there is an appeal. It bears no resemblance to national policy and departs from clear purpose of HLS mechanism to ensure that there is a pool of sites of sufficient capability to create a realistic prospect that local housing need will be met in a timely fashion in the relevant 5 year period. The appellant places process above good, sound and sensible planning.

Deliverability, not delivery

- 8.23. There is a clear distinction in NPPF paragraph 73 between delivery and deliverable. The appellant conflates the two and the error manifests itself in two principal ways: it forms the basis for the application of an inflated OB to **the Council's deliverable sites**; and it forms the basis **for the appellant's** erroneous discounting of deliverable sites.
- 8.24. The *St Modwen* judgment⁹⁴ in paragraphs 35-39 highlights the essential distinction between the two concepts. Deliverability is a less demanding test than delivery. The fact that a particular site is capable of being delivered within five years and thus deliverable, does not mean that it necessarily will be

⁸⁷ RID15 paragraphs 10, 11, 23 and 29

⁸⁸ RID15 paragraphs 24 and 25

⁸⁹ See Colchester Road decision at CD6.22 paragraph 65

⁹⁰ PPG ID: 68-004-20190722 and 68-007-20190722

⁹¹ CD6.22 paragraph 62

⁹² CD6.17 paragraphs 23 and 24

⁹³ CD6.18 paragraph 55

⁹⁴ CD7.6

delivered. The judgment also highlights that the likelihood of housing being delivered within 5 year period is no greater than a realistic prospect, not certain or probable. The revisions to the NPPF does not affect this judgment including the definition of deliverable which is materially unchanged in the first part of that definition in the 2012 and 2019 versions.

- 8.25. *St Modwen* does not create new law but explains the correct interpretation of national policy. This is confirmed in the more recent *East Bergholt* judgment⁹⁵ at paragraphs 47-51, **which highlights that 'realistic prospect' is a matter of planning judgment**

Adjusting the assessment of deliverable sites

- 8.26. This issue relates to whether the assessment of deliverable sites should be adjusting by applying an OB and if so, what method of discount for OB should be applied. The Council uses OB to refer to lapse rates while the appellant uses it to refer to a **discount to apply to the Council's HLS to address alleged inaccuracies** in the assessment. The Council applies a lapse rate to all sites with forecast delivery in the 5th year of supply by discounting delivery of the site in each year by 10%. The appellant advocates a blanket discount of 28-30% to the supply but applies no such discount in its own assessment.
- 8.27. **The Council's position is that** it no longer considers it appropriate to apply a lapse rate due to the site by site assessment it undertakes. However, to be consistent with the approach for Plan:MK, a lapse rate was included in the HLS assessment in June 2019 and in the evidence to this appeal. This is to ensure robustness. **The appellant's HLS witness** has also carried out a site by site assessment and so there appears to be little difference that a lapse rate or OB is not required. It is open to the decision-maker to conclude that it is not required as the detailed assessment of sites reduces uncertainty.
- 8.28. **The appellant's OB should not be applied as its HLS witness has compared** the assessment of deliverable supply with actual delivery. This is erroneous and an unrelated comparison contrary to *St Modwen*. Just because a deliverable site was not delivered does not undermine the assessment of deliverability. It would also be inconsistent with national policy. For the purposes of NPPF paragraph 73, it is agreed that only a 5% buffer is necessary rather than 20% which is intended to make up for the significant under delivery of housing over previous three years. **This achieves the same purpose as the appellant's OB.** To impose the OB would be inconsistent with the NPPF which has decided it is not appropriate to apply a 20% buffer. Lapse rates were not applied in **Mid Suffolk or Babergh's HLS assessments** and the appellant has confirmed that it does not support a lapse rate⁹⁶.
- 8.29. If a discount is to be applied to this appeal, then it should be the lapse rate in accordance with the **Council's methodology and not the appellant's OB.**

Permitted development prior approval notifications

- 8.30. This relates to the grant of prior approval pursuant to Class O of Schedule 2 to the Town and Country Planning (General Permitted Development) (England)

⁹⁵ RID09

⁹⁶ RID17 paragraph 1.16

Order 2015 (GPDO) and the calculation of 5 year HLS. The Council's position is that it results in detailed planning permission which falls within category (a) of the NPPF definition of deliverable. This is a matter of law not planning judgment.

- 8.31. The NPPF should be interpreted consistently with the planning acts as judgments have found⁹⁷. Section 336(1) of the Town and Country Planning Act 1990 (TCPA 1990) **defines "planning permission" as a permission under Part III TCPA 1990**. The GPDO is made pursuant to Section 58 TCPA 1990, which falls within Part III TCPA 1990. Accordingly, where article 3 of the GPDO grants planning permission for development in Schedule 2 to the GPDO (including Class O), that planning permission is a permission under Part III TCPA 1990 **and thus within the definition of "planning permission" in s. 336(1) TCPA 1990**. **On this basis, the reference to "detailed planning permission" must include planning permission granted pursuant to Class O.**
- 8.32. **The appellant's argument that the government** was aware of Class O permitted development rights when drafting the NPPF definition of deliverable and the express omission of Class O is deliberate fails because the definition of deliverable includes such permissions under Class O.
- 8.33. A development with prior approval is indistinguishable from other types of permission in category (a). No further consent is required other than discharge of conditions like a site with full planning permission. This contrasts with the sites in category (b) where further consent is required. This approach is consistent with the SoS in the Hanging Lane decision⁹⁸ at paragraph 21 where **he agreed with the Inspector's analysis** regarding the inclusion of prior approval sites.
- 8.34. If the appellant is correct, then homes created under Class O would fall outside the 5 year HLS entirely. The PPG⁹⁹ states for the purposes of calculating 5 year supply housing completions can include conversions and changes of use. Furthermore, it is inconsistent with the rationale for Class O which is to boost housing delivery. The appellant has not referred to any appeal decisions or case law to support its approach and offered no cogent reason why homes created under Class O should be excluded from the definition of deliverable. Under category (a), the burden of proof is on the appellant to show clear evidence that a site will not be delivered.

*Site by site assessment – general points*¹⁰⁰

- 8.35. **At the roundtable session, the appellant's approach was based on a number of common and erroneous themes.** Firstly, the criticism of the proformas which has been dealt with above. Secondly, the discounting of proformas from MKDP for no reason other than assertion that they would be inaccurate for the purposes of the Council preparing its assessment. MKDP is an arms-length organisation with the remit of bringing land forward for housing, it has detailed local knowledge and no reason to doubt its responses. A similar approach was taken to responses from Homes England, who are a non-departmental public

⁹⁷ CD7.4 paragraphs 19 and 20

⁹⁸ CD6.20

⁹⁹ PPG ID: 068-029-20190722

¹⁰⁰ **Appendix 1 to the Council's closing submissions sets out a summary** on strategic sites

updated proformas). All of this progress is consistent with the two recent grants of detailed planning permission, both of which were for more homes than expected.

Western Expansion Area (Site 3)

- 8.42. There have been completions on Area 10 for 4 years (5 including current year). Up to 1 April 2019 there have been 712 completions since the site started delivering and 300 delivered in this year alone. This area has delivered **1000 homes and is only 32 short of meeting this year's projected figure**. For Area 11, there has been 834 completions over last 4 years and over the last 2 years the completions have been 267 and 268 homes. There have been 133 completions for this year, more than projected. Combined, the two areas are delivering in the same manner (high 200dpa almost 300dpa each). The **Council's assessment** is consistent with the proformas and supported by a documented disposal strategy. There has been a sense check of developer information with a more conservative approach adopted by the Council.

Strategic Land Allocation (Site 4)

- 8.43. **The Council's** careful parcel by parcel analysis is to be preferred as it is clearly grounded in the evidence of ongoing completions. For example, taking the area as a whole, 181 completions were projected across the whole site for 2019/20 and as the Q3 monitoring data demonstrates, 187 have been completed.

The Council's final 5 year HLS position

- 8.44. Scenario 1: removal of conceded site – Land at Galleon Wharf (Site 14) for 14 units.

1 April 2019	No. of Units
Annual requirement	1,767
Requirement to 1 April 2019	5,301
Completions to 1 April	4,529
Shortfall	772
5 year requirement	9,607
5 year requirement including 5% buffer	10,087
Supply as at 1 April 2019	13,610
MKC Lapse Rate	678
Supply as at 1 April 2019	12,932
5 year	6.41
Surplus	2,845

- 8.45. Scenario 2: removal of conceded site – Land at Galleon Wharf for 14 units and **inclusion of all adjustments in paragraph 4.62 of Council's HLS** proof of evidence with the exception of paragraph 4.6.11 (Site C3.2 Central Milton Keynes) as this was deemed undeliverable as of 1 April 2019.

1 April 2019	No. of Units
Annual requirement	1,767
Requirement to 1 April 2019	5,301

Completions to 1 April	4,529
Shortfall	772
5 year requirement	9,607
5 year requirement including 5% buffer	10,087
Supply as at 1 April 2019	13,252
MKC Lapse Rate	650
Supply as at 1 April 2019	12,602
5 year	6.25
Surplus	2,515

8.46. Scenario 3: as per Scenario 2 but with Council lapse rate not applied.

1 April 2019	No. of Units
Annual requirement	1,767
Requirement to 1 April 2019	5,301
Completions to 1 April	4,529
Shortfall	772
5 year requirement	9,607
5 year requirement including 5% buffer	10,087
Supply as at 1 April 2019	13,252
MKC Lapse Rate	0
Supply as at 1 April 2019	13,252
5 year	6.57
Surplus	3,165

Conclusions on 5 year HLS

8.47. For the reasons above the Council submits that its approach should be preferred and that it has demonstrated a 5 year **HLS**. **The Council's approach is robust, sensible and consistent with national policy.** By contrast the **appellant's** approach is artificial, focussed on process not good planning and inconsistent with national policy.

The Development Plan

Plan: MK

8.48. **The appellant's planning witness accepted at cross-examination** that the development is contrary to Policies DS1 and DS2 of Plan:MK. He suggested that it was nevertheless in general conformity with the approach that underlines the spatial strategy, but the spatial strategy is DS1 and DS2 and so this must be rejected. Policy DS1 draws a distinction between the urban area of Milton Keynes where development should be within and adjacent to that area, and the rural area where new development should be within the key settlements, villages and other rural settlements. **The appellant's planning witness accepted** that Policy DS2 is to be read in combination with Policy DS1. Thus, it only contemplates housing within the defined boundary of the key settlements. He also accepted that the appeal site does not fall within any of the 13 criteria in Policy DS2.

- 8.49. The Plan:MK Inspector as recently as February 2019 found Policies DS1 and DS2 were consistent with NPPF 2012 subject to modifications¹⁰². The Inspector considered the overall strategy for Woburn Sands and found no need to modify the settlement boundary to make a specific allowance for additional development¹⁰³. **The appellant's witness accepted that the spatial** strategy of Plan:MK is that there is no requirement for Woburn Sands to meet. Thus, there is no inconsistency between Policies DS1 and DS2 and NPPF paragraph 65 (which requires plans to set out housing requirements for neighbourhood areas) given the findings of the Plan:MK Inspector. The policies therefore carry full weight for this appeal.
- 8.50. The objective of Policy DS5 is, amongst other things, to recognise and safeguard the character of the areas within the Borough beyond the settlement boundary. The **appellant's witness accepted conflict with this policy** and that it is consistent with the NPPF 2019 and up to date. As such, it carries full weight. The Plan:MK Inspector found the policy was sound. The NPPF allows plans to include policies that conserve and enhance the natural environment, not just protect valued landscapes.

The Neighbourhood Plan

- 8.51. The policies in the WSNP remain the same as the first Inquiry but circumstances have moved on not least with the adoption of Plan:MK. **Paragraph 19 of the SoS's** decision only gave moderate weight to Policy WS5 since it defined boundaries by reference to a Local Plan only intended to guide development to 2011. However, the role of the WSNP and its boundaries have been considered afresh within Plan:MK and particularly Policy DS2. As above, the Plan:MK Inspector concluded that no modification was required in terms of the settlement boundary. Further, he concluded that Plan:MK was the first opportunity to systematically review settlement boundaries in the Borough and he found them to be robust. Therefore, the WSNP boundary is robust and up to date.
- 8.52. Policy WS5 is not purely a countryside protection policy, it is a settlement boundary policy indicating the approach to development within the boundary. This is not contrary to the NPPF, which also allows neighbourhood plans to include policies to conserve and enhance the natural environment. The appellant cannot assert that Policy WS5 is inconsistent and out of date but agree that Policy DS5 is consistent and up to date. The two policies reflect the same policy approach. The arguments concerning the bullet points in WS5 go nowhere since they are all contingent on Plan:MK identifying a need for a boundary change which it did not. As such they do not apply. Accordingly, Policy WS5 is to be given full weight for this appeal
- 8.53. The same is true in respect of Policy WS6. The appellant only raised points regarding the consistency of bullet points in that policy, none of which are engaged as Plan:MK did not identify any need for boundary changes. Thus, Policy WS6 is consistent with the NPPF and up to date and should be given full weight.

¹⁰² CD3.32 paragraphs 31-45

¹⁰³ CD3.32 paragraph 34

Density

- 8.54. As a matter of law, the grant of outline planning permission will establish that the density of the development, however it is distributed across the appeal site and, however many units will come forward, will be acceptable in principle. Accordingly, if outline permission were granted as sought and a developer were to apply at the reserved matters stage for 203 units distributed across the appeal site, the Council would not lawfully be able to refuse planning permission on the basis that the density of what is proposed is too low and makes an inefficient use of land contrary to Policy HN1 and/or paragraphs 122/123 of the NPPF. The Planning Encyclopedia states that density is not a reserved matter referred to the court judgment in *Chieveley*¹⁰⁴. The appellant has not suggested the use of a condition to reserve density for later approval and this has not been addressed at the Inquiry. Thus, there is no evidence for the SoS to consider such a condition.
- 8.55. **The Council's planning witness was confused in cross-examination** on the matter of whether reserved matters approval could be refused on the grounds of density. That suggestion cannot be found in the written evidence of either party since it is wrong as a matter of law. The decision-maker has to determine now whether a proposal which would allow up to 203 units across the whole of the redline area would be acceptable in density terms. This is a planning judgment as to whether the development would make efficient use of land.
- 8.56. NPPF paragraph 122 sets out a number of factors to consider as to whether a development makes efficient use of land. This approach is echoed in Plan: MK via Policy HN1(c) which is consistent with NPPF paragraphs 122 and 123 and so is up to date and given full weight. The policy adopts a flexible approach to ensure appropriate densities on a case by case basis. Any judgment needs to be sensitive to the extent to which land is being released to meet a housing need. **The appellant's planning witness accepted the greater the need and/or shortfall in HLS the greater this will pull towards a higher density level.**
- 8.57. Local market conditions and viability in this case do not pull towards a higher or lower density. There is no constraint in the availability and capacity of infrastructure and services which would prevent additional housing above 203 units. This site is in a sustainable location and no evidence that any increase in units would give rise to severe consequences for the local highway network.
- 8.58. **In terms of maintaining the area's prevailing character and setting, the SoS's** decision considered this matter in relation to the then extant Policy H8 which sought a density of 35dph. The SoS must have considered that such a density was acceptable in terms of character and appearance. He noted that the scheme was a significant departure from policy in paragraph 26 of his DL.
- 8.59. Since the SoS decision, the only material change in terms of the character of the area is that Policy H8 has been replaced with Policy HN1. While the latter does not contain a requirement for 35dph, the objection of bringing forward the highest density that can be delivered while ensuring that the development would still relate well to character and appearance has not.

¹⁰⁴ RID23

- 8.60. It is evident from paragraph 26 of the DL that the SoS must have concluded conflict with NPPF paragraph 122 since in paragraph 24 he had found that Policy H8 was consistent with this paragraph. The SoS had previously found only limited effects of the scheme on visual and landscape considerations implying that the site has strong visual containment. As such, there is scope for the density to increase while maintaining an appropriate buffer and landscape boundary without unduly affecting character and appearance. There is no reason to reach a different conclusion now as the scope for additional development to be accommodated. Thus, the only reasonable conclusion is that the development does not make efficient use of land contrary to NPPF paragraph 122 and Policy HN1.
- 8.61. The appellant argues the site should be released due to a lack of 5 year HLS. NPPF paragraph 123 is highly relevant here. Where there is shortage of housing land, it is especially important to avoid low densities and to optimise the use of each site. Paragraph 123(a) relates to plan making, but the policy response of a significant uplift in the average density applies in a decision-taking context. Paragraph 123(c) is clear that proposals which fail to make efficient use of land they should be refused planning permission, even in the context that includes circumstances where there is a shortage of housing land. If sites are to be released to meet housing needs, they must be utilised efficiently to reduce the overall amount of land that has to be released.
- 8.62. Where a development comes forward that does not make efficient use of land it must be refused even in the context of additional housing need. Any conflict with NPPF paragraphs 122/123 must be given significant weight against the grant of permission. Any less weight would not achieve the policy objective of optimising densities in situations of housing need.
- 8.63. The appellant cannot argue for a site to be released due to a shortfall of sites but propose a scheme which reflects the low density of adjacent development that is below the average density for Woburn Sands (26-27dph). There is no evidence that even with 203 units the amount of development is optimal. The appellant has not produced evidence that shows a higher density would be unacceptable in planning terms¹⁰⁵. The appellant has reduced the planning judgment to a series of comparisons of density calculations.
- 8.64. **The appellant's recalculation of density was flawed in that it omitted access roads and other elements.** This excluded roads initially described as estate roads which should have been included in the net developable area as without them access to houses could not be achieved. **The Council's Urban Capacity Study** which supported Plan:MK makes it clear this approach was inconsistent¹⁰⁶. The appellant revised density figure is thus flawed and overstates the density. The reliance placed by the appellant on the 50% net developable area approach adopted in the Strategic Housing Land Availability Assessment¹⁰⁷ is also misplaced since that documents predates the revisions to the NPPF on density.

¹⁰⁵ In response before its closing submissions, the appellant noted that at the first Inquiry, an illustrative proposal by the appellant for 303 dwellings (Document 11.13) did not find favour with the Inspector at paragraph IR9.46

¹⁰⁶ CD5.12 paragraphs 1.1.3 and 1.2.2

¹⁰⁷ CD5.15 paragraph 7.7 and table 7.2

- 8.65. **The comparative exercises in the appellant's planning witness' rebuttal**¹⁰⁸ is flawed as it does not compare like with like. The areas examined include larger areas of open countryside rather than focusing on the built-up area and so does not help with whether the development makes efficient use of land. None of the above gives rise to any reason to reach a different view from that concluded previously by the SoS. It is submitted that the simple fact here is that the proposed development would not make efficient use of land and is unacceptable in policy terms as a result. Regardless of the HLS position, the conflict with the NPPF is so significant it justifies refusal in its own right.

Best and most versatile land (BMV)

- 8.66. The appellant accepted that the development will result in the loss of some BMV and that this gives rise to a conflict with Policy NE7. He accepted that Policy NE7 is consistent with the NPPF and up to date and is to be given full weight in the determination of this appeal.

Benefits of the proposed development

- 8.67. Regardless of the HLS position, it is accepted that the provision of affordable housing should be given significant weight. If there is a 5 year HLS, the benefits of extra market housing are moderate at best. The weight to ascribe should take into account that the actual amount of housing that may come forward is uncertain (up to 203). If there is no 5 year HLS then the benefits of extra market housing could be significant, depending on the number and how many units are likely to be delivered in the 5 year period.
- 8.68. It will take time for decision on this appeal. It took 18 months last time. If it is assumed that a decision to allow is reached in 6 months (July 2020) there would be a period of time to secure reserved matter approvals and discharge pre-commencement conditions before works start on site. Based on the **evidence of the appellant's HLS witness**, the average time from grant of outline permission to commencement on site is 5 years. If that were applied here, the development would make no contribution to the 5 year HLS. If commencement began at a rate 5 times faster i.e. July 2021 there would be delivery in the 5 year period. At 50dpa, this would be 150 units at most, so the weight to be given to the contribution to 5 year HLS must be reduced.
- 8.69. There have been no material changes in circumstances in terms of economic benefits, which should be ascribed moderate weight.
- 8.70. The appellant cites the provision of an alternative route to the existing Cranfield Road / Newport Road junction as a highway benefit, but the updated TA presents modelling that shows increases in queue lengths and traffic flows at both the Newport Road and Cranfield Road junctions. While a very modest impact, this does not suggest improvement. There is no appraisal of the benefit to safety and so anything suggested is just assertion. Thus, while the development is acceptable in highway terms, there are no material benefits to be weighed in favour.
- 8.71. It is unclear the extent to which the offer relating to medical facilities is justified as necessary to make the development acceptable in planning terms

¹⁰⁸ APP10

or the extent to which that offer goes beyond the mitigation of what is proposed. To the extent that it mitigates the effect of the development it is not a benefit but rather what is required to render the scheme policy compliant. To the extent that it goes beyond that position then it cannot be given weight as a benefit since to do so would be contrary to regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010.

- 8.72. No details have been provided to show that the development would provide potential to mitigate the risk of surface water flooding. Since this alleged benefit would involve drainage proposals which seek to address a pre-existing issue it cannot be required by condition or by a planning obligation since it goes beyond that which is related to the development proposed. To give this factor weight would thus be contrary to the requirements of NPPF paragraphs 55 and 56 and to regulation 122 of the CIL Regulations 2010
- 8.73. A high quality living environment is unknown at this stage given the outline nature of the proposal. Further, such a requirement is required to be delivered by all development in Milton Keynes as a result of Policies D1 and SD1 of Plan:MK. This is not a benefit but a policy requirement and so carries no weight.

The proper approach to the determination of this appeal

- 8.74. Policies DS1, DS2, DS5, HN1 and NE7 of Plan:MK and Policies WS5 and WS6 of the NP are all relevant development plan policies. They are also the policies which are the most important to determining the application¹⁰⁹. Further, as has been established above, they are all consistent with the NPPF and are up to date. The Council has a 5 year HLS. Thus, NPPF paragraph 11(d) is not engaged and rather it is NPPF paragraph 11(c) that should be used.
- 8.75. Plan:MK is up to date. The development does not accord with it overall since it conflicts with the spatial strategy, its policy approach to making efficient use of land and to avoiding the loss of BMV. Section 38(6) of the 2004 Act requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. The development conflicts with the above policies and so is not in accordance with the development plan.
- 8.76. The **development's benefits are not of such a nature or scale to justify** departure from the constraint policies of a recently adopted plan. All of the benefits could be claimed by any housing development on greenfield land on the edge of any settlement in Milton Keynes. The weight to these benefits cannot be such as to outweigh the conflict with the development plan. Thus, the development conflicts with NPPF paragraph 11(c) and is not sustainable development. It does not accord with the development plan with insufficient material considerations to outweigh the conflict.
- 8.77. If, **contrary to the Council's case, NPPF paragraph 11(d) is engaged**, it is accepted that the application of policies in the NPPF that protect areas or assets of particular importance do not provide a clear reason for refusing the proposed development. As such, NPPF paragraph 11(d)(i) does not provide a

¹⁰⁹ Based on the cross-examination of appellant's planning witness and the evidence in chief of the Council's planning witness

reason for refusing planning permission. Accordingly, the tilted balance in paragraph 11(d)(ii) would be engaged.

- 8.78. There would be adverse impacts in a development of inappropriate density and the loss of BMV. These impacts would conflict with NPPF paragraphs 122, 123(c) and 170(b). In circumstances where greenfield land is to be released to meet housing needs due to inadequacies in the 5 year HLS it is all the more important that efficient use is made of that greenfield resource to meet as much of the unmet need as is possible (NPPF paragraph 123). The development does not optimise the use of the site but promotes a sub-optimal density and continues the inefficient low density development of the past. This clear breach of NPPF paragraph 123 should result in refusal given the importance of the issue and the clear words of paragraph 123(c). This is an adverse impact contemplated by the NPPF as justifying refusal.
- 8.79. Even if NPPF paragraph 11(d) is applied, the Council submits that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. Accordingly, the proposed development does not represent sustainable development even on this basis. This means that the NPPF weighs heavily in favour of refusal of planning permission. Applying section 38(6), even in circumstances where there is no 5 year HLS, the breach of the development plan together with the breaches of the NPPF weigh heavily in favour of refusal. It is submitted that the other material considerations which weigh in favour of the grant of planning permission are not sufficient to outweigh these factors. Thus, even if there is no 5 year HLS, planning permission should be refused for the proposed development.

Conclusion

- 8.80. The planning system should not be an obstacle course for local planning authorities. It should be about delivering homes that are needed at the right time and in the right place. That is best achieved via the plan-led system and not ad hoc at appeal, making judgments on the capability of housing supply with regard to all material evidence.
- 8.81. Plan:MK is not even 12 months old since adoption and yet is faced with submissions that there is no 5 year HLS. All relevant evidence should be considered for the 5 year HLS position. All that a decision maker has to guard against is skewing the 5 year period by not including schemes in the assessment that were not there at the outset. The obstacle course promoted by the appellant has no place in policy or guidance and is wholly impracticable.
- 8.82. The proposed development is contrary to a development plan which is less than a year old and up to date. It is contrary to the NPPF. The application of section 38(6) points firmly in favour of refusal.

12. Conclusions

12.1. The numbers in square brackets refer back to earlier paragraphs which are relevant to my conclusions.

Main Considerations

12.2. The main considerations for the reopened Inquiry were informed by the previous decision letter, notwithstanding submissions by both main parties on the extent to which specific sections of that letter remain a material consideration. Nevertheless, it was broadly accepted that those sections which did not form part of the High Court judgment to quash the first decision, or have not been overtaken by circumstances such as the adoption of Plan:MK, remain relevant to this redetermination. [7.1-7.4 and 8.2-8.4]

12.3. The main considerations were narrowed down at the pre-Inquiry meeting¹²⁴. At the start of the Inquiry the main parties confirmed that the effect on the character and appearance of the landscape was no longer a main consideration. It was agreed that the main considerations now are as follows¹²⁵:

- (a) whether or not the Council can demonstrate a 5 year supply of deliverable housing sites;
- (b) whether the proposed housing would be in an appropriate location having regard to the development plan and national policies, as well as routes of potential new transport infrastructure;
- (c) the acceptability of the proposed housing density; and
- (d) the overall planning balance in relation to the economic, social and environmental dimensions of sustainable development.

Housing Land Supply

12.4. A number of overarching themes were debated at the Inquiry which are discussed below before turning to an assessment of specific sites and whether the Council can demonstrate a 5 year HLS.

The definition of deliverability

12.5. The 2019 revision to the NPPF definition of deliverable retains reference to “a realistic prospect that housing will be delivered on the site within five years” as it did in the original 2012 version of the NPPF. The Court of Appeal judgment in *St Modwen* found that realistic prospect did not mean a site’s deliverability must necessarily be certain or probable. It also noted the distinction between deliverability and delivery in that a deliverable site does not necessarily have to be delivered. [8.23-8.24]

12.6. The more recent Court of Appeal judgment in *East Bergholt* noted that a decision maker could adopt a more cautious view when assessing a “realistic prospect”. It went on to say that the assessment of realistic prospect falls

¹²⁴ CD10.44

¹²⁵ It was agreed by the main parties at the start of the inquiry that the effect of the development on the character and appearance of the landscape and surrounding area was no longer a main consideration

within the realms of policy and planning judgment rather than a legal concept. The judgment did not seek to take a different view on the distinction between deliverability and delivery. Therefore, I consider that the *St Modwen* and *East Bergholt* approaches are broadly compatible and there is no need to favour one over the other when assessing deliverability. [7.21, 8.25]

- 12.7. Nevertheless, the 2019 revision to the NPPF resulted in a more precise approach to the assessment of deliverability, with two specific categories (a) and (b) and the need to provide clear evidence in both. This necessitates a site specific assessment to determine whether a site is deliverable.

The base date and timescale of the evidence

- 12.8. The Council uses a base date of 1 April 2019 for the purposes of calculating its 5 year HLS position. It published its assessment in June 2019 with the housing trajectory in Appendix 1 containing notes on deliverability. Proformas were sent out by email on 20 May 2019 asking for a reply by 7 June 2019. Where no response was received, this was followed up. It was accepted by the Council that the amount of evidence predating 1 April 2019 that informed the assessment was limited. [7.26]
- 12.9. However, there is nothing in the NPPF or PPG that stipulates that all of the documentary evidence for a 5 year HLS has to be available at the base date itself. Instead, the PPG advocates the use of the latest available evidence. A local planning authority can prepare and consult on an APS after the 1 April base date before submission to the Planning Inspectorate by 31 July. While not directly applicable here, this indicates that evidence can be produced and tested after the base date. The HLS position statements in Babergh and Mid Suffolk for the 2019-2024 period were published in September 2019 and included data to justify supply that was only known about after 1 April. [7.25, 8.16, 8.17, 8.19, 8.20]
- 12.10. The Council has avoided adding new sites after the base date to prevent the skewing of supply in line with the Woolpit decision. While the Woolpit Inspector criticised the retrospective justification of sites after the publication of the Annual Monitoring Report, the Inspector at Darnall School Lane permitted additional evidence to support sites identified as deliverable at the base date which was a position accepted by the SoS in that case. The Longdene and Colchester Road Inspectors took a similar approach. In terms of Milton Keynes appeals, the Castlethorpe Road and the Globe Inspectors took into account the proformas used by the Council to inform its June assessment of 5 year HLS. [7.23, 7.24, 8.18, 8.21]
- 12.11. Therefore, I consider it acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable as of 1 April 2019.
- 12.12. The appellant argues for a 1 October 2019 base date in order to take into account **the Council's June assessment** and quarterly monitoring data. This would result in a necessary adjustment of the 5 year supply period to 30 September 2024. There is little in national policy or guidance that advocates such an approach and it would appear to go against efforts to create greater certainty in the planning process. I concur with the Council that such an approach would mean having to argue HLS at every appeal, rather than having

a fixed base date. Moreover, the quarterly monitoring data is not intended to be an updated assessment of supply¹²⁶. Thus, I do not consider it necessary to apply a 1 October base date. Nevertheless, if the SoS disagrees on this point, my assessment of specific sites below includes an assessment of the 5 year HLS supply position using a 1 October base date. [7.27, 8.22]

The proformas

12.13. The **appellant's criticisms of the Council's use of proformas** focused on whether they provided sufficient written evidence in line with the guidance in the PPG 68-007 and, in some cases, whether the reliance on information provided by bodies such as Homes England and the MKDP on sites in public ownership was appropriate. [7.28, 7.30]

12.14. Dealing with the former, the Council clarified at the Inquiry that the proformas included a covering letter explaining their purposes for assessing 5 year HLS. Representatives of each site were asked to confirm or amend the **Council's trajectory for each site**. Although relevant boxes were not always ticked, the proformas were signed and returned with a covering email in many cases. While a SOCG or MOU could provide more information, they offer no more of a commitment to the deliverability of homes than a proforma. Therefore, I consider that a proforma can, in principle, provide clear evidence **of a site's deliverability**. Additional evidence to support a proforma can also be taken into account subject to its specific content and timing. [8.11, 8.21, 8.36]

12.15. Turning to the latter, it is apparent that some publicly owned sites have not come forward as quickly as anticipated such as Tattenhoe Park. However, the evidence linking slow delivery to unreliable forecasting from the bodies responsible for managing the disposal of these sites is not conclusive. Although representatives of Homes England and MKDP form part of the group that assesses the proformas, there is little to suggest that their responses to their own proformas is misleading or inaccurate in principle. Therefore, it would not be appropriate to automatically disregard all of their sites. [8.35]

Past forecasts and the application of discount rates

12.16. The first Inspector for this appeal noted the uncertainty, slippage and failure in the **Council's** forecasts of housing delivery and that reasonable adjustments would clearly reduce the HLS to less than 5 years. Evidence presented to this Inquiry has noted the historic under-delivery of housing against forecasts of around 28-30%. While delivery is not the same as deliverability, it is apparent that past forecasting has not been particularly accurate. However, recent evidence in terms of housing delivery has shown that the Council met its annual delivery requirement from Plan:MK for 2018/19 and is set to do so again for 2019/20. The number of units under construction is at a high rate. [7.31, 7.32, 8.8].

12.17. The Plan:MK Inspector found the plan sound in terms of housing delivery rates and considered the higher delivery to be realistic with minimal risk of non-delivery. I accept that the Inspector examined the plan under the

¹²⁶ LPA3 paragraph 2.9

2012 NPPF definition of deliverable and it should not be assumed that because the plan was found sound that a 5 year HLS can be demonstrated now. There is a need to review sites on the basis of the 2019 NPPF definition. Indeed, the Council has removed sites in the Plan:MK supply for completion by 31 March 2024 where it no longer considers they meet the new definition. [7.16, 8.9, 8.13]

12.18. Nevertheless, the appellant has not applied a discount of 28-30% to their **assessment of the Council's** 5 year HLS as they have carried out a site by site assessment. Moreover, the appellant accepted that for the purposes of establishing whether a 5 year HLS exists, it is only necessary to apply a 5% rather than a 20% buffer in Milton Keynes due to rates of delivery. [8.26, 8.28]

12.19. The Council has historically applied a lapse rate to its forecasting of HLS for sites with delivery in Year 5, where a 10% discount is applied across the 5 years for those sites. Given that the Council has moved to a site by site assessment, it considers that such a discount is no longer necessary. However, for robustness and consistency with the Plan:MK trajectory, the discount has been applied to this appeal by the Council. Therefore, I have taken into **account the Council's lapse** rate as part of my HLS assessment. Based on recent delivery rates and Plan:MK, I see no reason to apply a greater discount than the **Council's rate** [8.27, 8.29]

Build-out rates

12.20. National reports¹²⁷ are helpful in identifying previous maximum average built-out rates over 5 years for large strategic sites like Brooklands (268 dwellings per annum). However, they can only be a guide and consideration should be given to evidence relating to specific sites as set out below. [7.29, 8.37, 8.39]

Prior approval sites

12.21. Prior approval sites are not mentioned in categories (a) or (b) of the NPPF definition of deliverable. **However, I am persuaded by the Council's** argument that where Article 3 of the GPDO grants planning permission for development in Schedule 2, that is within the definition of planning permission in the TCPA 1990. Such approvals are designed to provide a boost to new housing and are required to be implemented within 3 years. The PPG at 68-029 only refers what can count as a completion for the purposes of calculating HLS. It refers to new build, conversions and changes of use, but only in the context of where housing has been completed. Nevertheless, the PPG and NPPF do not explicitly exclude prior approval sites from housing supply. The Inspector and SoS at the Hanging Lane decision found that such sites can be taken into account as part of a 5 year HLS assessment. [7.74, 8.30-8.34]

12.22. Thus, I consider that prior approval sites can be regarded as having detailed planning permission and can form part of the supply of deliverable sites within category (a). The onus is on the appellant to demonstrate clear

¹²⁷ Such as CD11.1

evidence that such sites do not have a realistic prospect of being delivered within 5 years.

Consistency with previous appeal decisions in Milton Keynes

- 12.23. The Globe and the Castlethorpe Road appeal decisions dated 5 and 26 September respectively came to different conclusions on whether the Council could demonstrate a 5 year HLS. The former said it could and dismissed the appeal whereas the latter said it could not and allowed both appeals. Both had regard to the most up to date evidence including the proformas and both noted the recent improvement in housing delivery. The Castlethorpe Road decision found that reliance on past rates of delivery to be inappropriate, but nevertheless applied an optimism bias to the supply at a point midway between the appellants and the Council. The decision also considered that clear evidence for at least 2,717 houses had not been shown.
- 12.24. The Castlethorpe Road decision was challenged by the Council, but permission to apply for statutory review was refused by the High Court. Nevertheless, it would be wrong to afford Castlethorpe Road more weight than the Globe on the premise that it was more legally robust as the Globe has not been tested in the same way. Likewise, while the Castlethorpe Road Inspector explains in paragraph 65 why he has come to a different view on HLS to the Globe Inspector, this is largely on the basis of the nature and manner in which evidence was presented to him rather than any criticism of the Globe decision. [7.33, 8.10-8.13]
- 12.25. Therefore, it is not possible to say that one decision should be preferred over the other. There is a need for consistency in appeal decisions along with clear explanations of any divergence in views from another Inspector. This report is based on the evidence before me, and where necessary, it will explain any difference in findings to the Castlethorpe Road or Globe Inspectors.

Assessment of disputed sites

- 12.26. The following assessment is based on the disputed sites set out in the **appellant's proof of** evidence for HLS (APP2/3), specifically in Table 23 and Appendix 3, along with the HLS SOCG (SOCG1), specifically Table 3. The **appellant's rebuttal proof updated** Appendix 3 and included at Appendix 3a **summarising the main parties' positions on each site** (APP4/5/6). Following the roundtable session, the appellant produced an errata document (RID20/RID36) that updates Table 23 in the proof of evidence and Table 3 in the SOCG. The errata document also contains updates to Tables 21 and 22 in the **appellant's** proof setting out the contended land supply positions at 1 April and 1 October 2019. **Appendix 6 of the Council's proof of evidence on HLS** (LPA2) contains the primary source of evidence for each site.

Strategic sites - Brooklands (Site 1) [7.35-7.37, 8.40]

- 12.27. Brooklands has detailed planning permission for all of its remaining parcels. While the projected completions are high, the rate of delivery over the past 4 years has been high at an average of 247dpa. There have been 267 completions in 2019/20 up to 1 January 2020 against a projection of 182. While one parcel did not submit a proforma response, **the Council's projections** are based on delivery across the wider site and the phasing methodology. The

appellant's criticisms in terms of the limited number of developers, local experience, past rates of delivery and national reports do not match the current build out rates since 2015/16. Therefore, there is a realistic prospect that the projected housing will be delivered in the 5 year period with no clear evidence to the contrary. This applies to the April and October base dates.

Strategic sites – Tattenhoe Park (Site 2) [7.38-7.39, 8.41]

- 12.28. The projected completions on Phases 2-5 at Tattenhoe Park were considered deliverable by the Council in the June HLS assessment, based on proformas returned that month. The completions were taken into account by the Globe Inspector and rejected by the Castlethorpe Road Inspector, both based on the above proformas. The 2018 tender documents for Phases 2 and 3, which were provided to the Council in November 2019, are an indication that Homes England is actively seeking to facilitate delivery of housing (including lead-in times and build out rates). Both phases now have detailed permission via reserved matter applications granted in October and November 2019. While the Castlethorpe Road Inspector found the evidence to be lacking, the additional information provides clear evidence that there is a realistic prospect of housing delivery in the 5 year period for Phases 2 and 3. This applies to both the April and October base dates. Conversely, no additional information has been put forward for Phases 4 and 5 and so there is an absence of clear evidence of their delivery. Thus, these phases are removed from both the April and October base dates (delete 195 units from Site 2)

Strategic sites – Western Expansion Area (Site 3) [7.40-7.41, 8.42]

- 12.29. The Western Expansion Area in terms of disputed elements consists of Area 10 Remainder and Area 11 Remainder. Both areas are covered by outline planning permission apart from one parcel that now has reserved matters approval for 152 units. The Council highlights the rate of completions for Area 10 since delivery began in 2015/16 which are now up to 300dpa. For Area 11, completions are up to 288dpa and have exceeded projections already for 2019/20. Site wide infrastructure is in place for the plots expected to deliver in the 5 year period. **The Globe decision took the Council's projections into** account whereas the Castlethorpe Road decisions did not. However, it is not evident that the latter had the benefit of the proformas dated 10 July 2019 given this was the same date as the hearing. A disposal strategy from the landowners dated December 2019 has been added to the evidence for both areas which sets out further evidence of projected completions. Based on the lack of land disposals since March 2019, this has led to the Council revising down its 5 year trajectory by 306 units for Area 10 and 229 units for Area 11 as a worst case scenario. Nevertheless, apart from these reductions, I consider that there is clear evidence of a realistic prospect of housing delivery for the remaining units in the 5 year period for either April or October (delete 535 units from Site 3).

Strategic sites – Strategic Land Allocation (Site 4) [7.42-7.44, 8.43]

- 12.30. The Strategic Land Allocation is divided into a number of large outline sites with several developers. There are 5 parcels that only had outline permission as of 1 April 2019. No proforma was submitted for the Ripper Land parcel and the only evidence is an email from the landowner who highlights

access issues. In line with the Castlethorpe Road Inspector, there is a lack of clear evidence regarding the deliverability of this site (delete 85 units).

- 12.31. No proforma has been submitted for the Land West of Eagle Farm South parcel but this has reserved matter approval. The appellant has queried the build-out rate alongside the other two Eagle Farm parcels with reserved matter approvals, but all 3 parcels have started delivering in line with or ahead of projections. As such, there is no clear evidence to indicate that Land West of Eagle Farm South will not deliver the projected housing in the 5 year period.
- 12.32. The remaining Eagle Farm parcel for 125 units has outline permission only with no proforma returned. An email from October indicates a reserved matter application in the summer of 2020, but it provides little else in the way of clear evidence that the projected number of units will be delivered within the 5 years (delete 125 units).
- 12.33. The proforma for the remaining outline permission at Glebe Farm was submitted after the June HLS assessment but indicates a strong rate of delivery of units. Two parts of the remaining outline permission now have reserved matters approvals from September and October 2019 for a total of 366 units. This surpasses the 310 projection in the 5 year supply and with two developers operating the build-out rates appear realistic. A proforma from one of the developers in November supports these rates. Although this evidence post-dates 1 April 2019, it clearly demonstrates there is a realistic prospect of delivering the projected amount of housing within the 5 year period.
- 12.34. The **Council's projection of 180 units** for the Golf Course Land was based on the proforma dated May 2019. Since then, reserved matters approval was granted on 1 November 2019. This additional information provides clear evidence of deliverability within the 5 year period.
- 12.35. The proforma for Church Farm indicates a reserved matters application by late 2019. The Globe decision found this to be sufficient information whereas the Castlethorpe Road decision considered it fell short. Further information indicates that the application submission has now slipped to Easter 2020 with issues regarding road to be agreed. This continues to fall short of the clear evidence to demonstrate a realistic prospect of delivery (delete 90 units).

Outline or pending permissions as at 1 April 2019

- 12.36. The June 2019 proforma for Newton Leys (Site 5) indicates the delivery of 80 units, which has been reinforced by reserved matters approval in September 2019. The Globe decision considered the site was deliverable and I consider there is clear evidence and a realistic prospect of delivery at either base date.
- 12.37. The June 2019 proforma for Campbell Park Remainder (Site 6) indicates the delivery of 300 units in the 5 year period. The Globe and Castlethorpe Road decisions came to opposite conclusions on the deliverability of this site. There is now further information in the form of email correspondence from December 2019 that outlines progress towards starting on site in 2021. This represents clear evidence of deliverability and as such there is a realistic prospect of the projected numbers coming forward for either base date.

- 12.38. The June 2019 proforma for Wyevale Garden Centre (Site 9) noted a resolution to grant planning permission. This was granted in July 2019. This supports clear evidence of the site being deliverable, while the build-out rates of 150 and 130 units in 2021/22 and 2022/23 appear achievable given that the development relates to apartments that can be delivered in larger numbers at one time. Therefore, there is a realistic prospect of the projected numbers coming forward for either base date.
- 12.39. Planning permission for the Agora redevelopment (Site 13) has lapsed and the June 2019 proforma noted viability issues and a pending decision on whether to list the existing building. The Castlethorpe Road decision found clear evidence to be lacking. Further information from November 2019 notes that the listing request was turned down and there has been progress towards planning permission and building demolition in 2020. While viability issues remain over S106 contributions, this does not appear to be a significant constraint. Based on the above, clear evidence of deliverability has been demonstrated and as such there is a realistic prospect of the projected numbers coming forward for either base date.
- 12.40. At the inquiry, the Council accepted that Galleon Wharf (Site 14) is not deliverable. I have no reason to disagree (delete 14 units).
- 12.41. The Railcare Maintenance Depot (Site 15) has outline permission, but the June 2019 proforma provides no information on progression towards approving reserved matters. The appellant also notes that part of the site has now been developed for a supermarket. Based on the lack of clear evidence, it has not been demonstrated that a realistic prospect of delivery exists for either base date (delete 175 units).
- 12.42. Eaton Leys (Site 16) has outline permission but no proforma was submitted in June 2019. However, a reserved matter application was pending and due to be determined by January 2020. A proforma was provided by the developer in December 2019 updating projections which appear achievable for the size of development and a major housebuilder. Thus, there is clear evidence of deliverability and as such a realistic prospect of the projected numbers coming forward for either base date.
- 12.43. The June 2019 proforma for Timbold Drive (Site 26) provides limited information on the delivery of the site notwithstanding an existing outline permission. The Council notes in its proof that a new outline permission is being sought. There is a lack of clear evidence of progress towards a reserved matters approval and a realistic prospect of delivery within 5 years has not been demonstrated (delete 130 units).
- 12.44. The June 2019 proforma for Land at Walton Manor (Site 33) provides little information on delivery. The site had an application for outline permission as at 1 April 2019 which was granted in November 2019. However, there is little information on start times and build out rates. Thus, clear evidence is lacking and a realistic prospect of delivery in 5 years has not been demonstrated (delete 115 units).
- 12.45. The June 2019 proforma for Land at Towergate (Site 34) notes marketing in the summer of 2019 and a start date of January 2021. Progress has been made in terms of discharging conditions, but there is limited

information on progress towards approving reserved matters. Thus, clear evidence is lacking and a realistic prospect of delivery in 5 years has not been demonstrated (delete 150 units).

- 12.46. For High Park Drive (Site 36), no proforma was submitted in June 2019. However, a reserved matters application was submitted in November 2019 along with applications to discharge conditions. A proforma from November 2019 indicates a start date of autumn 2020. Thus, there is clear evidence of deliverability and as such a realistic prospect of the projected numbers coming forward for either base date.
- 12.47. For Land East of Tillbrook Farm (Site 40), the anticipated reserved matters application in the summer of 2019 did not materialise but a January/February 2020 application was indicated in further information. Thus, there is clear evidence of deliverability and as such a realistic prospect of the projected numbers coming forward for either base date.
- 12.48. The June 2019 proforma for Land West of Yardley Road (Site 42) indicated the submission of a reserved matters application in July. The Globe decision found the site was deliverable. The application was delayed until November 2019, but this still demonstrates progress towards securing detailed permission. Thus, there is clear evidence of deliverability and a realistic prospect of the projected numbers coming forward for either base date.

Sites with prior notification approval as at 1 April 2019

- 12.49. Based on the above reasoning, Maybrook House (Site 37), Mercury House (Site 38) and Bowback House (Site 39) can be considered as having detailed planning permission based on their prior notification approval to convert from officers to residential. No proformas have been submitted for these sites, but the assumption should be that there is a realistic prospect of delivery unless clear evidence indicates otherwise. All 3 sites had prior notification granted in 2018 and so as of 1 April 2019 there was still ample time to implement. While the sites may not be fully vacated now and being marketed for office use, there was a realistic prospect of delivery as of 1 April 2019 with no clear evidence to the contrary. Therefore, all 3 sites can be included within the 5 year supply.

Allocated sites as at 1 April 2019

- 12.50. No evidence for the South East Milton Keynes Strategic Growth Area (Site 7) was presented to the Castlethorpe Road Inspector and so it was discounted. However, the Council note that the projection is based on the Plan:MK trajectory and the SOCG to the plan examination. There is the uncertainty of whether the route of the Oxford to Cambridge Expressway will go through the site, delaying progress with delivering housing. However, the Plan:MK Inspector referred to a modest output by 2023/24. Although there have been delays to announcements on the preferred route of the Expressway, progress is being made towards a planning application for a smaller part of the site and a wider Development Framework is being prepared. Therefore, clear evidence of a realistic prospect of delivering 50 units on the site has been demonstrated.

- 12.51. Berwick Drive (Site 8), Food Centre (Site 10), Redbridge and Rowle Close (Sites 11 and 12), Land off Hampstead Gate (Site 19), Land off Harrowden (Site 20), Hendrix Drive (Site 22), Kellan Drive (Site 23), Singleton Drive (Site 24), the former Milton Keynes Rugby Club (Site 25), Land north of Vernier Crescent (Site 28), Manifold Lane (Site 29), Daubney Gate (Site 30), Springfield Boulevard (Site 31), Reserve Site Hindhead Knoll (Site 32), Reserve Site 3 (Site 35) and Tickford Fields (Site 41) are all allocated sites where the June 2019 proformas gave little information on the delivery of these sites and the Castlethorpe Road decision found clear evidence to be lacking.
- 12.52. For Site 8, Site 23 and Site 31 there is further information from the **Council's property team dated November 2019 setting out a specific timetable** for delivery by 2021, albeit with a revised number of dwellings. For Site 10, there is now a planning performance agreement for the site, and hybrid planning applications have been submitted following positive public consultation events for a significantly larger number of units overall. The **Council's June assessment projected 298 units delivered in the 5 years**, although this has been revised down to 200 units based on the further information. For Site 19, Site 29, Site 30, Site 32 and Site 41 there is further information in the form of emails setting out the timetable for an application and construction. For Site 25, land disposal has been agreed and plans prepared. Based on the above, clear evidence of deliverability has been demonstrated and as such there is a realistic prospect of the projected numbers coming forward for either base date.
- 12.53. For Sites 11 and 12, an updated proforma and letter from November 2019 confirms that the sites have passed through a neighbourhood plan examination with increased unit numbers. However, there is no clear evidence of a timetable for submitting planning applications and starting on site (delete 19 + 18 units). For Sites 20, 22, 24, 28 and 35 there is no further information provided meaning that there is still a lack of clear evidence to demonstrate a realistic prospect of delivery for either base date (delete 25 + 10 + 22 + 14 + 22 units).
- 12.54. The Lakes Estate Neighbourhood Plan site allocations (Site 17 as well as Site 18 Phelps Road and Site 27 Southern Windermere Drive) gave limited information on firm progress towards the submission of an application and the Castlethorpe Road decision found clear evidence to be lacking. Further information and timings have been submitted in November 2019 providing greater detail on progress towards submitting the application and starting on site. The development would deliver a net total of 398 dwellings allowing for the demolition of existing Council homes. Phase A will involve the construction of 110 new homes, with further new homes in Phase B only once demolition has taken place in early 2022. Therefore, there is a realistic prospect of delivering the 130 units projected by the Council over the 5 year period, with clear evidence to support this for either base date.
- 12.55. The self-build plots at Broughton Atterbury (Site 21) form part of an allocated site with the wider site subject to detailed planning permission. However, the June 2019 proforma provides little information on the delivery of this site and no further information has been provided on this matter or evidence of demand for such plots. Thus, there is a lack of clear evidence to

demonstrate a realistic prospect of delivery for either base date (delete 6 units).

New sites between 1 April and 1 October 2019

- 12.56. In the event that a 1 October 2019 base date is preferred, there are a few sites that could be included in the 5 year supply, although the appellant disputes their inclusion. Omega Mansions (Site 43) and Chancery House (Site 45) are prior notification approvals for office to residential granted in July and August 2019 respectively. There is no clear evidence to indicate these sites with detailed permission will not deliver within the 3 years of their approval. Therefore, they can be included for an October base date. Cable House (Site 44) is a duplication with Mercury House and so has not been included. The appellant has also referred to a prior notification site at Station Road Elder Gate (Site 48) although I have little information on this site including any projected numbers. As such, it makes no difference to the supply either way.
- 12.57. Land south of Cresswell Lane (Site 46) was an allocated site as of 1 April 2019 but gained detailed permission for 294 flats in July 2019. A proforma from November 2019 indicates delivery within the 5 years which is achievable for two blocks of flats. There is no clear evidence to suggest there is not a realistic prospect of delivery and so the site can be included for an October base date.
- 12.58. The Castlethorpe Road decisions (Site 47a/b) granted outline permission for 50 units on one site (a) and detailed permission for 51 units on the other site (b). For the latter, there is no clear evidence to indicate non-delivery in the next 5 years. For the former, there is no clear evidence to demonstrate progress towards reserved matters approval. Therefore, I can include Site 47(b) for an October base date but exclude Site 47(a) (delete 50 units).

Sites potentially delivering between 1 April and 30 September 2024

- 12.59. If the base date is shifted to 1 October 2019, this would necessitate moving the end date to 30 September 2024 in terms of the 5 year period. Based on the June 2019 assessment, there are 13 sites currently in Year 6 (2024/25) that are shown as starting to deliver in that year. At the Inquiry, the Council only sought to argue that 4 of them have a realistic prospect of delivery. The amount for each site would be half of that shown in Appendix 1 of the June assessment for 2024/25 given that 1 April to 30 September is 6 months.
- 12.60. The sites at the rear of Saxon Court (Site 49), the rear of Westminster House (Site 50), Site C4.2 (Site 51) and the Cavendish site (Site 52) within the Fullers Slade regeneration project are all allocations in Plan:MK. There is little evidence of progress towards applications for any of these sites. Site 49 has had a development brief prepared but there is no other information. The regeneration project has been through a referendum and a development programme agreed. While an application could be submitted in late 2020 and delivery commence in the 5 year period for Site 52, there is little evidence to support this position. Therefore, it has not been shown that there is a realistic prospect of delivery for these 4 sites and they should not form part of the 5 year supply for a 1 October 2019 base date (delete 20 + 15 + 22 + 9 units).

Conclusion on housing land supply

- 12.61. For the 1 April 2019 base date, the Council considers it has a surplus of 2,845 units with a lapse rate applied to the supply (removing 678 units) in Scenario 1 above [8.44]. The appellant's closing statement reports the **Council's contended surplus to be 2,844** which is one unit lower [7.19]. The discrepancy is not clear, but I have used the lower surplus figure just in case. The above assessment deletes a number of units from specific sites coming to a total of 1,750 units deleted for a 1 April base date. This would reduce the surplus to 1,094 units and result in a supply of 11,181 units (12,931 – 1,750). Set against an agreed 5 year requirement of 10,087 units this would result in a HLS of 5.5 years. Bearing in mind that the lapse rate has only been applied to ensure robustness, I am satisfied that the Council can realistically demonstrate a 5 year HLS for this base date.
- 12.62. For a 1 October 2019 base date position, the **Council's surplus based on** its monitoring data and its approach to assessing deliverability is 3,859. The reduction in units set out above, including those sites purported to be in a 5 year supply between 1 October 2019 and 30 September 2024, comes to a total of 1,866 units deleted. The effect on the surplus would reduce it to 1,993 units and result in a supply of 12,083 units (13,949 – 1,866). Set against a 5 year requirement of 10,091 units, this would result in a 5 year HLS of 5.99 years for this base date.
- 12.63. **I have had regard to the Council's** Scenario 2 [8.45] which includes all of the adjustments in paragraph 4.62 **of the Council's proof** (LPA1) except paragraph 4.62.11 along with the removal of Site 14 at Galleon Wharf. This scenario sees an overall reduction in supply by 330 units from Scenario 1 but still provides a 5 year HLS of 6.25 years. My assessment above has already applied the adjustments to the sites in paragraphs 4.62.1 and 4.62.2 and deleted all or part of the sites in paragraphs 4.62.6, 4.62.12 and 4.6.13. It has not applied the adjustments in the remaining paragraphs, but even if it did, this would result in a minor overall addition of 95 units to the supply for the April base date. Thus, Scenario 2 does not affect my findings on HLS.
- 12.64. Scenario 3 is the same as Scenario 2 [8.46] but without the Council's lapse rate applied. I have decided that it would be prudent to apply the lapse rate and so this scenario also does not affect my findings on HLS.
- 12.65. In conclusion and based on the evidence before me, I find that the Council can demonstrate a 5 year supply of deliverable housing sites whichever approach is taken in terms of the base date, and even with the application of **the Council's** lapse rate. In the event that the SoS finds that a 5 year supply cannot be demonstrated, I deal with this scenario and its implications below.

The Location of the Development

The Development Plan – Plan: MK

- 12.66. The appellant accepts that the proposal conflicts with Policies DS1, DS2 and DS5 of Plan:MK due its location in the open countryside outside of the development boundary for Woburn Sands. While adjacent to this key settlement, the proposal does not meet any of the 13 criteria set out in Policy

DS2 and neither does it meet any of the exceptions in Policy DS5. [7.5, 8.48, 8.50]

12.67. The appellant argues that the proposal is in accordance with the approach that underpins the Plan:MK spatial strategy given that it adjoins a **key settlement that Plan:MK defines as 'chosen for development'**. There is general agreement between the main parties that the site is in a sustainable location with regards to its proximity to a range of services and facilities in Woburn Sands. The NPPF supports housing in such locations and where it can enhance or maintain the vitality of rural communities. However, I consider that the location and type of development does not comply with Policies DS1, DS2 and DS5 which sets out the spatial strategy for residential schemes. The presence of a 5 year HLS means the weight to any conflict with these policies is not diminished. [7.5, 7.93, 7.94, 8.49]

12.68. While Plan:MK does not set out housing requirements for the Woburn Sands neighbourhood area as advocated in NPPF paragraph 65, the Plan:MK Inspector considered that no specific allowance for additional development was necessary for this settlement. The development boundary is tightly drawn around the settlement but it has been reviewed as part of the Plan:MK examination with amendments made to accommodate recent planning approvals. This is not to say that there is a cap on development in Woburn Sands, but there is no policy requirement to deliver additional housing in this settlement. Moreover, it has not been demonstrated that Policies DS1, DS2 and DS5 are inconsistent with the NPPF in terms of their approach to the spatial strategy and the location of housing and the objective to safeguard the countryside from inappropriate development. [7.6, 7.7, 7.92, 8.49, 8.50]

The Development Plan - Woburn Sands Neighbourhood Plan

12.69. The appellant accepts that the proposal conflicts with WSNP Policy WS5 as none of the exceptional circumstances currently apply to allow for an extension of the current development boundary. The appellant stressed that WSNP Policy WS6 is parasitic on Policy WS5 and only allows for a limited amount of additional housing in the plan area and none of the listed circumstances apply. [7.9, 7.13]

12.70. The WSNP has not been reviewed within 5 years of it being made and it makes no allocations for housing. The **previous Inspector's report and SoS** decision only gave moderate weight to Policy WS5 as it was based on tightly drawn boundaries and the old Milton Keynes Local Plan 2001-2011. The requirement in the policy for any boundary amendment through Plan:MK to be agreed by the Town Council was not recommended by the examiner. Such a requirement is at odds with the NPPF which clarifies the hierarchy of local plans over neighbourhood plans. [7.10-7.12]

12.71. However, as noted above, the development boundary has been reviewed and updated as part of the Plan:MK process and no specific allowance for additional development was necessary. There is no inconsistency with the NPPF in terms of how Policies WS5 and WS6 seek to safeguard the countryside and direct development to specific locations. Therefore, significant weight can be afforded to both policies and any conflict with them, particularly in light of a demonstrable 5 year HLS. Neither policy should be regarded as being out of date. [7.14, 8.51-8.53]

Proposed new transport infrastructure

- 12.72. It is conceivable that the route of the Oxford to Cambridge Expressway could travel through or near to the appeal site based on the preferred option of Highways England and the various constraints within the Woburn Sands area. However, there has yet to be a formal announcement on the next stage of this road project or further public consultation on specific options or routes. Plan:MK addresses the Expressway in relation to the South East Milton Keynes extension in terms of the timing of any planning permission but does not preclude development in specific locations as the details and future of the project are still yet unclear. The main parties agree that the proposal does not conflict with the development plan insofar as the Expressway is concerned and so does not warrant refusal of the proposal on this matter. [6.1, 7.95, 7.96, 9.3, 9.7, 9.10, 10.3]
- 12.73. The East-West rail project would see greater use of the line through Woburn Sands and interested parties have expressed concerns regarding the potential increased frequency of the level crossing being closed. However, there is little evidence that the appeal proposal would hamper the delivery of the rail project or result in unacceptable traffic conditions insofar as the level crossing is concerned. Again, there is no conflict with the development plan or reason to refuse the proposal on this matter. [9.3, 9.7, 9.8, 9.12]

Conclusion on the location of the development

- 12.74. While there are no reasons to withhold permission having regard to routes of potential new transport infrastructure, the proposed housing would not be in an appropriate location having regard to the development plan and national policies. As noted above, it would conflict with Plan:MK Policies DS1, DS2 and DS5 and WSNP Policies WS5 and WS6.

Housing Density

- 12.75. At the time of the first SoS decision, Policy H8 of the Local Plan 2001-2011 sought a density of 35dph. The SoS found that the density of the proposed development, which was generally considered to be 16dph at the time, was a very significant departure from this policy with significant weight given to the conflict. Policy H8 has since been replaced with Policy HN1 of Plan:MK which sets no density limit but seeks a balance between making efficient use of land with respecting the surrounding character and context. [7.99, 8.58]
- 12.76. Paragraphs 122 and 123 of the NPPF have not changed between the 2018 version considered by the SoS and the current 2019 version. Paragraph 122 seeks efficient use of land taking into account various factors including the **desirability of maintaining an area's prevailing character and setting**. Paragraph 123 seeks to avoid low densities, but only in the context of an existing or anticipated shortage of land. Given my findings above, this paragraph is not applicable. Policy H8 was considered by the SoS to be consistent with the NPPF, but it is clear that he found conflict with the policy only. This is because he said that the various factors in paragraph 122 did not justify the departure from policy (DL26). [7.98, 8.60]

- 12.77. At the first Inquiry, the appellant demonstrated¹²⁸ how 16dph was broadly comparable to the densities of immediately adjoining residential streets. The first Inspector found the proposed density to be acceptable. At the second Inquiry, the appellant contended that the net density based on the illustrative layout would actually be 20.3dph. The parties disagreed on the extent of land within the site that would be developed for housing and directly associated uses including the access roads. Around 50% of the site would be developed for housing, but there is no agreement on the overall density. [7.97, 8.64]
- 12.78. The fact that there is disagreement over an illustrative layout for a proposal where all matters are reserved apart from access indicates that the final density figure cannot be established at this point. As part of any reserved matter application relating to layout, the provision and situation of buildings, routes and open spaces across the site area is to be assessed and determined. Thus, while density is not a specific reserved matter, the eventual layout could affect the density figure. If the layout was unacceptable to the Council in terms of how it related to the development and buildings and spaces beyond, it could refuse the reserved matters application. Thus, I am persuaded more by the judgment in *Inverclyde* which found density could be considered as part of a reserved matter than the judgment in *Chieveley* which focused on gross floor space. [7.101, 7.102, 8.54, 8.55]
- 12.79. No condition has been put forward to fix a specific density or developable area. The development is for up to 203 dwellings. Thus, it is not possible to be certain of the final density figure. There is no detailed analysis from the Council on a specific density figure or range of figures. Its planning witness stated that the development should reflect the overall average density of Woburn Sands which is 27dph. However, this is based on an unverified figure in the appeal decision for the Nampak site. The appellant's **analysis** indicates that the built-up area of Woburn Sands has a density of 23.7dph. Its density figures for the individual parishes are lower but less helpful as they include large area of countryside. [7.100, 8.63, 8.65]
- 12.80. Notwithstanding the disagreement over density figures and the scope of reserved matters, even if the original figure of 16dph is preferred, this would be in keeping with the surrounding character and context of the adjoining streets. The illustrative layout would reflect the spaciousness of these existing streets with the use of open space buffers to safeguard the living conditions of neighbouring properties and the setting of the listed farmhouse. Little evidence has been presented to suggest that a density beyond 16 or 20dph would be acceptable in terms of character and appearance. The first Inspector found that an indicative layout for 303 dwellings would not be desirable in terms of landscaping, amenity and context. **Although the site's location has good access** to facilities including public transport, it has not been demonstrated that higher density development would be acceptable. In the event that a 5 year HLS could not be demonstrated, there would need to be adequate justification that a higher density could work in this location. [7.100, 8.63]

¹²⁸ CD2.6 appendix 13

- 12.81. While the final layout and density of the development has yet to be fixed, I consider that a scheme based on the illustrative layout with a density of 16-20dph would be relatively low but would be acceptable in this instance for this location. It would balance an efficient use of land with respecting the surrounding character and setting, and so would accord with Plan:MK Policy HN1 and NPPF paragraph 122. While I have reached a different conclusion to the SoS in his first decision, this is based on the changed development plan context, the ability to finalise density at reserved matters, and having regard to the context and character of nearby residential streets. [7.4, 7.103, 8.65]
- 12.82. If the SoS concludes differently and finds that the proposed density would not represent an efficient use of land, then there would be conflict with Plan:MK Policy HN1 and NPPF paragraph 122. This would increase the amount of weight against the proposal.

Other Matters

Best and most versatile agricultural land

- 12.83. The loss of Grade 3a agricultural land within the site would conflict with Plan:MK Policy NE7. However, site allocations such as the South East Milton Keynes Strategic Growth Area encompass larger areas of best and most versatile agricultural land. The Council has not sought to argue that this matter on its own would justify refusing the development and so the policy conflict only carries moderate weight. A balance needs to be struck between the economic and other benefits of such land versus the benefits of the development. [7.109, 8.66, 9.12]

Ecology and drainage

- 12.84. The first Inspector noted that the ecological value of the site was limited due to its agricultural use with most of the existing habitats contained within the trees, hedgerows and ponds on the field margins. These habitats would be mostly retained and enhanced by the development with measures secured by condition. An updated desktop study and site assessment was undertaken in September 2019 with no major changes since the original 2016 ecology reports. [6.1, 7.116, 9.11]
- 12.85. The existing badger sett would be removed to allow for the new access from Newport Road. This would require a derogation licence to avoid an offence under the Conservation of Species and Habitats Regulations 2010. There is no requirement for a derogation licence to be provided prior to grant of planning permission, but the decision-maker must be assured that there would be a reasonable prospect of the licence being granted by Natural England.
- 12.86. The provision of housing is in the public interest, while there is no alternative but to move the badger sett given its location. The creation of an artificial sett as close as possible to the original location would provide temporary refuge and would have to be in use before the licence application. Other mitigation measures during construction would also seek to limit risks to badgers. These measures should maintain the species at a favourable conservation status. Based on these considerations, there is reasonable prospect of Natural England granting a licence. As a consequence, the

development would not have an unacceptable effect on ecology or protected species.

- 12.87. As noted by the first Inspector, the development offers the means to alleviate current drainage problems through additional attenuation and the use of a suitable maintenance regime. There should be sufficient space to allow for the drains set out in the hydrology assessment. The site is within Flood Zone 1 which has the lowest risk of flooding and the development would provide sufficient ponds, swales and ditches to address surface water run-off. The measures and maintenance plan can be secured by conditions and so the development would not have an unacceptable effect on drainage. [6.1, 10.2]

Highways and parking

- 12.88. The development would provide a new route between Newport Road and Cranfield Road to alleviate some of the problems associated with the junction next to the level crossing. The first Inspector noted that all of the junctions would achieve suitable visibility splays and that there would be no unacceptable highway safety impacts. The updated TA for the second Inquiry provides new trip generation and distribution estimates taking into account more recent data and reviews existing and proposed junction modelling. It concludes that there would be very modest impact on all junctions and routes with no adverse effect on highway capacity or the need for any more complex highway designs such as ghost island right turn lanes. While I note the concerns raised by interested parties about traffic impacts, the evidence before me does not indicate that the development should be restricted on highways grounds. The first Inspector noted little evidence of parking stress within Woburn Sands and the intention for a Travel Plan to encourage sustainable modes of transport. I have no reason to come to a different view on parking. [6.1, 7.107, 7.108]

Facilities and services in Woburn Sands

- 12.89. Woburn Sands retains a number of services and facilities including schools, shops and a medical centre, with a bus service and train station. While it may have lost or reduced the amount of services and facilities in recent years, the town remains designated as a key settlement in Plan:MK. Concerns regarding capacity limits at the schools and medical centre can be addressed via financial contributions in the S106 agreement, which also provides the opportunity for additional medical provision within the site. There is little evidence before me to indicate that the development would have an unacceptable impact on services and facilities in Woburn Sands. [6.1, 7.115, 9.2, 9.3, 9.9]

Heritage assets

- 12.90. The Grade II listed Deethe Farmhouse has architectural and historic interest as an 18th century property with later alterations. Its significance is also informed by its setting, which today includes the industrial estate as well as the agricultural fields of the appeal site. The former, due to their modern utilitarian appearance and use contribute little to the significance of the farmhouse, whereas the latter make a positive contribution as remnants of the **building's agricultural past. The building is not highly visible from either the road or the site due to planting and so the positive contribution of the appeal site is only moderate.**

- 12.91. The development would change the rural setting of the farmhouse but the illustrative layout plans shows that a landscaping buffer can be provided within the site to wrap around the shared boundary. Layout and landscaping details could be addressed at reserved matters stage. For the above reasons, the development would result in less than substantial harm to the significance of the listed building. The level of harm would be low due to the existing setting and the proposed mitigation measures. Nevertheless, NPPF paragraphs 193 and 194 state that great weight should be given to the conservation of the listed building and that any harm requires clear and convincing justification. In line with NPPF paragraph 196, this harm will be weighed against the public benefits below. [6.1, 7.105]
- 12.92. The recently designated Grade II registered park and garden at Wavendon House forms part of the grounds to the Grade II* listed Wavendon House and extends close to the northern boundary of the site. The significance of the park and garden derives from its historic and design interest as an 18th century pleasure ground and park laid out by a significant landscape improver of the time (Richard Woods). Wavendon House itself has architectural and historic interest as a country estate home of 17th century origins largely remodelled in the 18th century. A mature belt of trees on the edge of the former golf course limit views between the park and garden and the site, while the listed house is further away to the north with additional landscape screening in place. Thus, the site only makes a minor contribution to the significance of both heritage assets as part of their wider setting. The development would provide trees and a landscape buffer along the boundary nearest to Wavendon House. Details could be addressed at the reserved matters stage. Given the existing screening and distances involved, there would be no harm caused to either heritage asset. [7.105]

Character and appearance of the landscape

- 12.93. The development would have a significant visual and landscape effect on the site itself given that it would change from agricultural fields to housing. However, as noted by the first Inspector and the first SoS decision, the site does not comprise a valued landscape and is contained by existing boundary vegetation which limits views from wider vantage points. Moreover, the site adjoins the edge of Woburn Sands and the development would be seen in the context of existing housing. Although some hedgerows and trees would be lost including those subject to a TPO, the intention is to retain and enhance planting. Little has changed in visual and landscape terms since the first Inquiry and decision. Therefore, I concur that the development would have a very limited effect on the character and appearance of the landscape. [6.1, 6.3, 7.104, 7.117]

The Planning Balance

- 12.94. A number of benefits have been put forward by the appellant. The provision of affordable housing beyond the minimum policy requirement should be strongly supported in line with Policy HN2 and so carries significant weight. The provision of market housing carries similar weight given the potential number that could be delivered and the eagerness of the appellant as a small to medium sized developer to deliver housing as swiftly as possible. The provision of medical facilities within the site is a potential social benefit but

only if it goes beyond mitigating the effect of the development which has not been proven. [7.110-7.113, 7.115, 8.67, 8.68, 8.71]

- 12.95. The economic benefits would include temporary construction employment, the provision of a range of homes for a cross-section of working people, secondary employment through increased spending in the local area and the payment of a new **homes'** bonus to the Council, some of which could be remitted to Woburn Sands Town Council. As such, reasonable weight can be afforded to these benefits. [7.114, 8.69]
- 12.96. In highways terms, while the new road through the site between Newport Road and Cranfield Road would offer an alternative route to the level **crossing junction, the appellant's update TA notes very modest impacts on all** junctions as a result of the development. The housing would reduce the extent and distance of car-borne commuting although not remove it altogether given the distance to major areas of employment and the relatively limited train and bus services. Therefore, only limited weight can be afforded any highway benefits. [7.118, 8.70]
- 12.97. The environmental enhancement of ecology and the provision of drainage measures to try and address existing problems would provide moderate benefits. **Little weight can be afforded to the appellant's claim of a** high quality living environment given the limited information at outline stage and the policy requirement that all development should be high quality. [7.116, 8.72, 8.73]
- 12.98. Taken a whole, the benefits range from limited to significant in magnitude. They can all be regarded as public benefits and set against the low level of harm to the significance of the listed farmhouse, they would provide clear and convincing justification for that harm. Having special regard to the desirability of preserving listed buildings and their setting in line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the development would have an acceptable effect in terms of heritage assets. [12.102-12.104]
- 12.99. The development would have an acceptable effect on a range of other matters listed above. It would also be acceptable in terms of housing density. There are insufficient grounds for withholding permission based on routes of potential national infrastructure projects and the negative effect on best and most versatile agricultural land would not, in itself, be a reason for refusal. The conflict with Plan:MK Policy NE7 carries moderate weight as set out above and would be outweighed by the benefits. [12.88-12.95]
- 12.100. However, there would be conflict with Plan:MK Policies DS1, DS2 and DS5 and WSNP Policies WS5 and WS6 due to the location of the site in the open countryside. I have found that a 5 year HLS can be demonstrated and so there is no reason to reduce the weight to the conflict with these policies on that basis. Policies DS1, DS2 and DS5 are not inconsistent with the NPPF and so carry full weight, while significant weight can be afforded to Policies WS5 and WS6 based on their NPPF consistency. As policies most important for determining the application, none of these 5 policies are out of date. As such, the tilted balance in NPPF paragraph 11(d) is not engaged. [7.119, 8.74-8.76, 12.79-12.84]

- 12.101. The **development's** conflict with the development plan in terms of the location of the housing carries substantial weight as it would not accord with the spatial strategy set out in Plan:MK. While a number of benefits would be achieved, they would be insufficient to outweigh the conflict with the development plan. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning permission should not be granted.
- 12.102. Alternatively, if the SoS finds that a 5 year HLS cannot be demonstrated or that the most important policies are out of date for other reasons, then the tilted balance in NPPF paragraph 11(d) would be engaged. As there are no policies in the NPPF that provide a clear reason for refusing the development (having had regard to the effect on designated heritage assets), it would be necessary to consider whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 12.103. Moreover, it should be noted that if the SoS finds that there is a housing land supply shortfall, then NPPF paragraph 123 would be engaged which seeks to avoid homes being built at low densities. NPPF paragraph 123(c) states that proposals should be refused where the decision maker considers that they fail to make efficient use of land taking into account the policies of the NPPF.
13. Recommendation
- 13.1 For the reasons set out above, I recommend that the appeal be dismissed.
- 13.2 Nonetheless, if the SoS is minded to disagree with my recommendation and allow the appeal, then the conditions listed in Annex 1 should be attached to any permission granted along with the obligations set out in the S106 agreement.

Tom Gilbert-Wooldridge

INSPECTOR

ANNEX 2: APPEARANCES

FOR THE APPELLANT

Peter Goatley and James Corbet Burcher of Counsel instructed by Stephen Webb of Clyde and Co LLP.

They called:

Roland Burton BSc (Hons) MRTPI	DLP (Planning) Limited
Tim Waller BA (Hons) DipTP MRTPI	Waller Planning
Julian Hudson MA (Oxon) MSc MSc MCIHT	Scott White and Hookins
Stephen Webb	Clyde and Co LLP

FOR THE LOCAL PLANNING AUTHORITY

Reuben Taylor QC and Matthew Henderson of Counsel instructed by Sharon Bridglalsingh of Milton Keynes Council.

They called:

James Williamson BA (Hons) MSs MRTPI	Milton Keynes Council
Niko Grigoropoulos BSc (Hons) MA MRTPI	Milton Keynes Council
Paul Van Geete	Milton Keynes Council
Nazneen Roy	Milton Keynes Council

INTERESTED PERSONS WHO SPOKE AT INQUIRY

Councillor Jacky Jeffries	Woburn Sands Town Council
Councillor David Hopkins	Danesborough and Walton Ward Councillor (Milton Keynes Council) and Chairman of Wavendon Parish Council
Judith Barker	Local resident
Jenny Brook	Local resident

Appendix 3 – West Berkshire – HLS February 2024

Housing Land Supply at February 2024

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Housing Land Supply at February 2024

1 Introduction

Introduction

1.1 This document sets out West Berkshire Council's assessment of its housing land supply from 1 April 2023 to 31 March 2028.

1.2 Paragraph 226 of the updated National Planning Policy Framework (NPPF) introduced a temporary measure that means West Berkshire Council only has to demonstrate four years of specific deliverable housing sites instead of the usual five. **The Council can demonstrate a 6.0 years' supply of deliverable housing sites, using a five-year housing land supply from 2023/24 to 2027/28 against a five-year housing land supply requirement. Therefore, the presumption in favour of sustainable development will not apply.**

1.3 Using an alternative calculation, the Council can also demonstrate a 5.2 years' supply of deliverable housing sites, using a four-year housing land supply from 2023/24 to 2026/27 against a five-year housing land supply requirement.

1.4 For the purposes of decision-making, the policies in the revised NPPF are material considerations which should be taken into account in dealing with applications made on or after 19 December 2023. With respect to planning applications made prior to 19 December 2023, the Council would have been able to demonstrate a 5.7 years' supply of deliverable housing sites, using a five-year housing land supply from 2023/24 to 2027/28 against a five-year housing land supply requirement plus a 5% buffer.

Policy Background

1.5 On 19 December 2023 a revised version of the National Planning Policy Framework (NPPF) was published and this includes new provisions in respect of the housing land supply.

1.6 Previously, the NPPF required all Local Planning Authorities (LPAs) to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement.

1.7 Under the revised NPPF, paragraph 76 also sets out the following circumstances when an LPA does not need to demonstrate a five-year housing land supply:

- it has an adopted plan which is less than five years old; and
- the adopted plan identifies at least a five-year supply of specific, deliverable sites at the time the examination is concluded.

1.8 Paragraph 76 of the NPPF does not presently apply to West Berkshire. The current West Berkshire Local Plan comprises of three documents all of which were adopted more than five years ago:

- Core Strategy Development Plan Document (DPD): adopted July 2012
- Housing Site Allocations DPD: adopted May 2017
- West Berkshire District Local Plan 1991-2006 (Saved Policies 2007) as amended in July 2012 and May 2017.

1.9 In addition, paragraph 77 of the revised NPPF now allows LPAs to demonstrate a minimum of four years' supply against their housing requirement if an emerging local plan:

- has been submitted for independent examination; or
- has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need.

1.10 The West Berkshire Local Plan Review 2022-2039 (LPR) was submitted for independent examination on 31 March 2023. The Council therefore meets the criteria to identify and update annually a four-year housing land supply with effect from 19 December 2023.

1.11 If West Berkshire Council is unable to demonstrate a four-year housing land supply, the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the NPPF and the corresponding footnote 8. This is to enable the development of alternative sites to meet the policy requirements. This requirement remains unchanged in the revised NPPF.

Housing Land Supply at February 2024

1.12 For the purposes of decision-making, the policies of the NPPF came into effect the day the revised NPPF was published (19 December 2023), however there are some transitional provisions.

1.13 Paragraph 76 only applies to applications made on or after 19 December 2023. The provisions of paragraphs 76 and 77 apply for a two-year period from the publication date of the revised NPPF (19 December 2023). Therefore, for planning applications made prior to 19 December 2023, the Council would need to demonstrate a five-year housing land supply against a five-year housing land supply requirement plus a 5% buffer.

Housing Land Supply at February 2024

The meaning of deliverable

1.14 The meaning of 'deliverable' is set out in the Glossary of the NPPF. This states:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

1.15 For any sites with full planning permission, and small sites with outline planning permission, the government guidance is clear that these should be assessed as being deliverable unless there is specific evidence to the contrary.

1.16 For major sites (site delivering 10 or more dwellings) with outline planning permission only, or allocated sites in the adopted development plan without planning permission, specific evidence is required. The Planning Practice Guide provides additional guidance (*PPG, Paragraph 007, Reference ID: 68-007-20190722*) on deliverability stating that evidence may include:

- Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- Firm progress with site assessment work; or
- Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

1.17 It is clear that deliverable means that sites should be realistically capable of being delivered within the next five years. It does not require certainty of delivery.

1.18 This interpretation was confirmed in the judgement; *St Modwen Developments Ltd v Secretary of State for Communities and Local Government*) (October 2017) in paragraphs 35 and 38:

"Deliverability is not the same thing as delivery. The fact that a particular site is capable of being delivered within five years does not mean that it necessarily will be. For various financial and commercial reasons, the landowner or house builder may choose to hold a site back. Local planning authorities do not control the housing market. The NPPF recognises that." (Paragraph 35)

"Sites may be included in the five year supply if the likelihood of housing being delivered on them within the five year period is no greater than a "realistic prospect" - the third element of the definition in footnote 11. This does not mean that for a site properly to be regarded as "deliverable" it must necessarily be certain or probable that housing will in fact be delivered upon it, or delivered to the fullest extent possible, within five years." (Paragraph 38).

1.19 Whilst the judgement was made with reference to the preceding NPPF, published March 2012, the key term 'realistic prospect' is unchanged in the revised NPPF.

Housing Land Supply at February 2024

2 The Housing Requirement

Housing Need

2.1 The first stage in the assessment of the housing land supply is the identification of the level of housing provision required. The housing requirement is that sufficient to provide a minimum of five-years' worth of housing, or a minimum of four-years' worth of housing if authorities that have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need.

2.2 The LPR was submitted to the Secretary of State on 31 March 2023 for independent examination. The Council therefore meets the criteria to identify and update annually a four-year housing land supply according to Paragraph 226 of the revised NPPF.

2.3 Paragraph 77 of the NPPF states that the housing supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need (LHN) where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to need updating).

2.4 The West Berkshire Core Strategy DPD was adopted in 2012, and the housing requirement is being reviewed through the LPR. The housing requirement for the four-year period is therefore based on the LHN calculated by the standard method.

2.5 The Council's decision to assess the housing land supply position against LHN does not indicate that the strategic policies established by the Core Strategy DPD is out of date. It simply reflects the requirements in the NPPF. The strategy established by the current Local Plan is fully meeting and exceeding the housing delivery requirements set out in both the Core Strategy and the level of LHN. The strategy established by the current Local Plan is therefore consistent with the NPPF with regards to housing delivery.

2.6 The Government first introduced the standard method for calculating the LHN alongside the publication of the revised NPPF in July 2018. This uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The LHN is derived in a number of steps, firstly setting the baseline using the average annual household growth projections (2014-based) for the area of the local authority over a 10 year period. Secondly an adjustment is made based on the affordability of the area, using the most recent median workplace-based affordability ratios. A cap can then be applied which limits the increases an individual local authority can face. Under the standard methodology it is not necessary to factor in previous levels of under delivery into the calculation of LHN, since any such under delivery will be reflected in the affordability adjustment. This is confirmed in the government's Planning Practice Guidance (PPG) - Housing and economic needs assessment, which states:

"The affordability adjustment is applied to take account of past under- delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately." (PPG, Paragraph 011, Reference ID: 2a-011-20190220).

Housing Land Supply at February 2024

2.7 The LHN for West Berkshire calculates as 515 dwellings per year as set out below.

Table 2.1 Calculation of Local Housing Need for West Berkshire

Step 1 - Setting the Baseline	
2014-based Household Growth (yearly average 2023 - 2033 of 3,749)	375
Step 2 - Affordability Adjustment	
Median Workplace-Based Affordability Ratio (2022, published in March 2023)	9.97
Adjustment Factor = $((\text{Local affordability ratio} - 4) / 4) \times 0.25 + 1$ = $((9.97 - 4) / 4) \times 0.25 + 1$	1.373
Step 2 Minimum annual local housing need figure = (adjustment factor) x projected household growth 1.373 x 375 = 514.8	515
Step 3 - Applying the Cap:	
Date of Plan Adoption	16/07/2012
Is the Plan more than 5 years old?	Yes
Housing requirement in last adopted plan	525
Cap @ 40% above Step 2 LHN (515 x 1.4)	721
Cap @ 40% above last adopted plan (525 x 1.4)	735
higher capped figure	735
Housing need subject to Cap	No
Step 4 - Minimum Local Housing Need	515

The Housing Land Supply Period

2.8 Paragraph 226 of the revised NPPF confirms that LPAs with a plan submitted for examination will only need to demonstrate a four-year housing land supply, with effect from 19 December 2023. Planning Practice Guidance that was updated on 5 February 2024 confirms that the four-year housing land supply that LPAs should demonstrate for decision making should consist of deliverable housing sites demonstrated against the authority's five-year housing land supply requirement, including the appropriate buffer (*PPG, Paragraph: 055 Reference ID: 68-055-20240205*). Therefore, the period 1 April 2023 to 31 March 2028 is covered in this update of the housing land supply report.

Buffer

2.9 A minimum of 5% buffer in addition to the housing requirement is no longer required in the revised NPPF. Paragraph 77 and 79 of the NPPF requires a buffer of 20% where the Housing Delivery Test (HDT) indicates that delivery has fallen below 85% of the LPA's housing requirement over the previous three years.

2.10 The government published the HDT 2022 measurement on 19 December 2023, which is an annual measurement of housing delivery in each LPAs area, looking back over the previous three financial years – 2019/20, 2020/21 and 2021/22. Paragraph 80 of the NPPF makes it clear that the Housing Delivery Test consequences, including the 20% buffer, will apply the day following the annual publication of the HDT result, at which point they supersede previously published results. Until new Housing Delivery Test results are published, the previously published result should be used.

Housing Land Supply at February 2024

2.11 Paragraph 79 of the NPPF sets out the policy consequences where the HDT indicates that delivery has fallen below housing requirement over the previous three years:

- a. where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
- b. where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of this framework, in addition to the requirement for an action plan.
- c. where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

2.12 As set out in Table 2.2 below the HDT measurement for West Berkshire for the period April 2019 to March 2022 is 134%. It is clear that under the HDT, West Berkshire is not required to apply any buffer to the LHN.

Table 2.2 Housing Delivery Test 2022

Year	Number of net dwelling completions including communal accommodation	Housing Delivery Test requirement
2019/20	439	476
2020/21	621	342
2021/22	723	509
<i>Total</i>	<i>1,783</i>	<i>1,327</i>
Average per year	594	442
Percentage delivery		134%

2.13 It should be noted that due to Covid-19 and the subsequent disruption to local authority services and the construction sector, the Government has reduced the 2019/20 housing requirement in the HDT by a month (ie. 31 days) to reflect this disruption. For the 2020/21 housing requirement, the Government has applied a four-month adjustment (ie. 122 days) in order to account for the most disrupted period of April to July 2021 due to the pandemic.

2.14 Table 2.3 below shows the housing requirement using a five-year period.

Table 2.3 The housing requirement

Housing requirement	LHN 515 dwellings per year
A. Requirement	2,575
B. Buffer (if applicable)	Not applicable
C. Requirement including buffer (A+B)	2,575

Housing Land Supply at February 2024

3 Sources of Housing Supply

3.1 This section provides an explanation of the sources of land supply that form part of the monitoring of housing land supply position. Specific sites are set out in the accompanying schedules in Appendix 1. Monitoring data with a base date of 31 March 2023 was used. Only sites that are allocated within the development plan or had planning permission at 31 March 2023 are included within the supply.

3.2 The NPPF indicates that sites that are not major development (site delivering less than 10 dwellings) and have outline or full planning permission, and all sites with full planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. Additionally, the NPPF also clarifies that sites for major development (site delivering 10 or more dwellings) with outline planning permission only or sites which are allocated in the development plan without planning permission, may be considered deliverable, but only when there is clear evidence that housing completions will begin on site within five years.

Allocated Sites

3.3 Allocated sites comprise both the strategic allocations in the Core Strategy and the allocations within the Housing Site Allocations (HSA) DPD. The Core Strategy allocated two strategic sites, at Newbury Racecourse and at Sandford, to the south of Newbury. The Newbury Racecourse site is currently under construction, with the first two phases of development already completed. The Sandford Park East site has an outline planning permission and firm progress has been made towards submission of reserved matters including site assessment works, discharge of conditions and drafting of a planning performance agreement, there is clear evidence that housing completions will begin on site within 5 years. The HSA DPD sites include a variety of sizes of site at the settlements within the settlement hierarchy outlined in the Core Strategy.

3.4 With regards to allocated sites with outline permission only, the Council has taken a conservative approach to estimating likely site delivery, examining each site in detail to ensure that allocated sites with outline permission are only considered to be deliverable where there is specific and clear evidence to indicate the amount of dwellings which will be delivered on site within the 5 year period.

3.5 In addition, some allocated sites are located within the River Lambourn Nutrient Neutrality Zone and there is a delay to determine the reserved matters application or to discharge related conditions due to requirements on nutrient mitigation. At the current time the Council is still in the process of working on strategic solutions for achieving nutrient neutrality, the Council therefore takes a more cautious approach to consider the site not deliverable within the five year period until a suitable mitigation strategy is in place, although delivery within the five year period is likely.

Large and Medium unallocated sites with planning permissions

3.6 Large sites are defined as sites delivering 10 dwellings or more, with a site size of at least 1 hectare. Medium sites are those of 10 or more dwellings but less than a hectare in size. These are sites that have not been allocated in the development plan and would therefore classify as windfalls, according to the definition in the NPPF.

3.7 The NPPF is clear that all sites with detailed planning permission should be considered deliverable until that permission expires. This is reflected in the land supply calculations, which applies this presumption and then estimates the amount of housing supply that will be delivered within the five year period. Taking this approach means that each individual large and medium site is evaluated annually to reflect its likely contribution towards the five year supply in any given year providing an accurate picture of delivery on site. Given the site-specific estimations of likely delivery and the presumption in the NPPF regarding sites with full planning permission, a general lapse rate is not applied to large and medium sites with planning permissions.

Prior Approvals

3.8 Also included in the schedules are sites identified through the prior approval process which do not require planning permission for changes of use to residential development due to permitted development rights. Most of these are changes from office to residential use.

Housing Land Supply at February 2024

Engagement with developers/agents

3.9 Government guidance indicates that authorities should involve those with an interest (in delivery) in assessing the deliverability of sites, and set out up-to-date robust evidence to support assessments of deliverability. The Council therefore produced a site deliverability form that was sent to agents / developers of allocated sites, large and medium sites and sites of 10 net dwellings or more identified through the prior approval process. Responses have been used to both assess deliverability of the site and to phase dwelling completions. The completed forms as well as any email responses received are included in Appendix 2.

3.10 The Council considers the information on delivery provided by the agent / developer as the most robust source and uses this as the starting point for considering what might reasonably be delivered within the five year period. Where necessary, the Council has adjusted the projected delivery to take account of any overly optimistic view, ensuring that the figures relied on by the Council within the five year period are as realistic as possible.

3.11 In cases where the agent / developer has not responded to approaches by the Council, the Council has assessed deliverability of the site using its knowledge of the developer, its knowledge of the specific site and proposed development, and gives consideration to likely lead in times and build out rates on different type of sites.

3.12 Where a site with planning permission is not considered deliverable within the five year period, it is excluded from the five year land supply calculation but may still be included at a later date if circumstances change.

Small Sites

3.13 The smaller sites of under 10 units are also listed in the schedules. These smaller sites have not been assessed for deliverability in the same manner as the larger sites, however the definition of 'deliverable' in the NPPF is clear that sites with planning permissions that are not major development should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within the five year period.

Communal Accommodation

3.14 Communal accommodation can now be included in the five year supply. The PPG (ID: 68-035-20190722) states that housing for older people including care homes (Planning Use Class C2) should be counted against the housing requirement. The HDT measurement rulebook gives the ratio for communal accommodation based on the national average number of adults in all households as 1.8 based on the 2011 Census. For example, a 90 bed care home would equate to 50 net dwellings ($90 \div 1.8 = 50$).

Windfall Allowance

3.15 The NPPF states that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall rates, and expected future trends.

3.16 The definition of windfall sites changed with the publication of the revised NPPF in 2018 and has been retained in the 2021 and 2023 NPPF. The new definition is: *"Sites not specifically identified in the development plan."*

3.17 Previously windfalls were those sites that unexpectedly became available. Sites that had been included in the Housing and Economic Land Availability Assessment (HELAA) or where there had been a previous planning application were not previously included as windfall, but as identified sites.

3.18 The Council has included an allowance for windfall in the calculation of the 5 year housing land supply. Analysis of past completions shows that over the plan period to 2023 an average of 380 units per year were completed on sites not allocated in the development plan, primarily on previously developed sites within settlements. These are all windfall sites.

Housing Land Supply at February 2024

Table 3.1 Net windfall completions over the plan period

Monitoring year	Large non-allocated sites (10 or more units and 1ha or more)	Medium non-allocated sites (10 or more units and under 1ha)	Small non-allocated sites (less than 10 units)	Total non-allocated sites
2006/07	313	159	202	674
2007/08	216	33	198	447
2008/09	100	217	161	478
2009/10	25	99	115	239
2010/11	40	46	113	199
2011/12	5	31	126	162
2012/13	223	211	118	552
2013/14	102	103	125	330
2014/15	-24	135	245	356
2015/16	40	277	125	442
2016/17	122	117	163	402
2017/18	40	139	134	313
2018/19	25	158	139	322
2019/20	27	113	109	249
2020/21	347	71	87	505
2021/22	122	236	95	453
2022/23	256	22	66	344
Annual Average 2006 to 2023	116	127	137	380

3.19 Table 3.1 shows the windfall completions by site size. This data forms the basis for the calculation of the windfall allowance. The Council has not included an allowance for large or medium sized windfall sites in the five year housing land supply. Development of large, and to a more limited extent, medium sites tends to vary significantly from year to year. The exclusion of this potential from the windfall allowance shows a cautious approach and introduces some flexibility to the supply.

3.20 An average of 137 dwellings have been completed on small unallocated windfall sites (9 dwellings or less) each year over the plan period to date. There is no reason why this level of development on small unallocated sites should not continue in the foreseeable future. Indeed the NPPF at paragraph 70 states that local planning authorities should:

"...support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes..."

3.21 The Council has therefore included a windfall allowance on small sites. The calculation of the windfall allowance is shown in Table 3.2 below, using an average of 137 small site windfalls per annum. To ensure against potential double counting with sites that have been granted planning permission, these current permission are deducted from the total allowance for the five year period and the resultant allowance for windfalls applied only in the later years of the five year period.

Housing Land Supply at February 2024

Table 3.2 Windfall allowance on small sites (April 2023 to March 2028)

A. Unallocated small sites with planning permission in the 5 year supply	314
B. Sites identified through the prior approval process in the 5 year supply	40
C. Total small sites identified in the 5 year supply	354
D. Average small site windfalls with planning permission completed per year between 2006/07 and 2022/23	137
E. Allowance for the five year period (D x 5)	685
Windfall allowance for small sites (E - C)	331

Housing Land Supply at February 2024

4 The Housing Land Supply

Table 4.1 The housing land supply

	2023/24 Year 1	2024/25 Year 2	2025/26 Year 3	2026/27 Year 4	2027/28 Year 5	Total 1 April 2023 to 31 March 2027	Total 1 April 2023 to 31 March 2028
Core Strategy Allocated Sites	51	15	39	105	146	210	356
Housing Site Allocations DPD Sites	94	237	276	166	42	773	815
Non-allocated sites for 10 or more dwellings with planning permissions	413	163	178	121	60	875	935
Non-allocated sites for less than 10 dwellings with planning permissions	153	129	32	0	0	314	314
Sites for 10 or more dwellings with prior approvals	50	141	0	0	0	191	191
Sites for less than 10 dwellings with prior approvals	22	18	0	0	0	40	40
Windfall allowance on small sites	0	0	57	137	137	194	331
Total Deliverable Supply excluding communal accommodation	783	703	582	529	385	2,597	2,982
Communal accommodation (dwelling equivalent)	24	36	28	3	0	91	91
Total Deliverable Supply including communal accommodation	807	739	610	532	385	2,688	3,073

Table 4.2 Housing supply to meet the LHN

	Five-year housing land supply against a five-year housing land supply requirement	Four-year housing land supply against a five-year housing land supply requirement
A. Requirement including buffer (if applicable) (A)	2,575 (515* 5 years)	2,575 (515* 5 years)
B. Total deliverable housing land supply including communal accommodation (B)	3,073 (five-year housing land supply)	2,688 (four-year housing land supply)
C. Total deliverable housing supply in years (B ÷ A x 5)	6.0 years	5.2 years

4.1 Paragraph 226 of the updated NPPF introduced a temporary measure that means West Berkshire Council only has to demonstrate four years of specific deliverable housing sites instead of the usual five. **The Council can demonstrate a 6.0 years' supply of deliverable housing sites, using a five-year housing land supply from 2023/24 to 2027/28 against a five-year housing land supply requirement. Therefore, the presumption in favour of sustainable development will not apply.**

4.2 Using an alternative calculation, the Council can also demonstrate a 5.2 years' supply of deliverable housing sites, using a four-year housing land supply from 2023/24 to 2026/27 against a five-year housing land supply requirement. This alternative calculation has been included to demonstrate an alternative way that the four-year housing land supply could be calculated. However, [the letter dated 5th February 2024 from Chief Planner Joanna Averley](#) confirmed that the four-year housing land supply position will be based on the performance against the five-year housing land supply, not an alternative calculation.

Housing Land Supply at February 2024

4.3 For the purposes of decision-making, the policies in the revised NPPF are material considerations which should be taken into account in dealing with applications made on or after 19 December 2023. With respect to planning applications made prior to 19 December 2023, the Council would have been able to demonstrate a 5.7 years' supply of deliverable housing sites, using a five-year housing land supply from 2023/24 to 2027/28 against a five-year housing land supply requirement plus a 5% buffer. The calculation is shown as below:

Table 4.3 Housing supply to meet the LHN

	Five-year housing land supply against a five-year housing land supply requirement with a 5% buffer
A. Requirement including a 5% buffer (A)	2,704 (515* 5 years*1.05)
B. Total deliverable housing land supply including communal accommodation (B)	3,073 (five-year housing land supply)
C. Total deliverable housing supply in years (B ÷ A x 5)	5.7 years

4.4 It is important to note the housing land supply position is always a snapshot in time that is subject to change due to various factors and based upon the current housing requirement as set by the Government.

Appendix 3b – West Berkshire – HLS February 2024 Site Proformas

Appendix 2

Housing Land Supply Site Deliverability Forms

Core Strategy Development Plan Document Strategic Site Allocations

Newbury Racecourse

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Georgina Mortimer			
Organisation (if relevant)	David Wilson Homes Southern			
Representing (if applicable)	David Wilson Homes Southern			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner		A Planning Consultant	
	A Public Land-owning Body		A Land Agent	
	A Registered Social Landlord		A Developer	X
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	X	Part owner	
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	n/a			
Has the landowner (or each owner) indicated support for development of the land?	n/a			

Part 2: Information on site deliverability

1. Site details		
Site address	Newbury Racecourse	
Number of residential units proposed	Net additional units	1500
	Gross (total) units	1500

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	14/03109/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	14/03377/RESMAJ – Eastern Area A (713 dwellings) (other phases built out)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live RM application 23/01100/RESMAJ for 289 dwellings, currently being updated to c. 249 units. This would see overall total number of dwellings across Eastern Area A reduced to 602 dwellings (and total number across whole development reduced to 1389 dwellings).
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – under application 16/01404/COND1.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Eastern Area A is currently under construction. C.249 dwellings are pending determination within live RM application 23/01100/RESMAJ (revised plans are due to be submitted back to the council in Dec 2023). This would see the total number of dwellings across Eastern Area A reduced to 602 dwellings. 353 dwellings will be completed by (June 2024), and the remaining 249 dwellings by Summer 2029.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	51
	2024/25	15
	2025/26	39
	2026/27	55
	2027/28	46
	2028/29	54
	2029/30	40
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? <i>Please give details</i>
<p>Economic market conditions.</p> <p>DWH submitted RM application 23/01100/RESMAJ for a revised apartment scheme within the Eastern Area to reduce the storey heights from the permitted designs, approved most recently under application 19/01551/NONMAT. This is due to significant cost inflation of reinforce concrete (RC) which would be the construction methodology required to deliver the approved designs and storey heights, and therefore DWH are proposing to change to a timber frame construction with a maximum storey height of 4 storeys. Building in timber frame will also allow DWH to build in a more sustainable material with modular off-site construction to improve building performance, sustainability and meet the latest requirements of Building Regulations. Updates to this application are due to be submitted to WBC in December 2023. Timing of delivery and/or economic viability may be impacted depending on the outcome of the application.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

--

8. Are you actively considering alternative types of development for the site? <i>Please give details</i>
--

n/a

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? <i>Please give details</i>

n/a

10. Additional comments

--

Completed by: Georgina Mortimer

Position: Planning Manager

Organisation: David Wilson Homes Southern

Date: 27th November 2023

Sandleford Park East

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Robert White			
Organisation (if relevant)	White Peak Planning Ltd			
Representing (if applicable)	Bloor Homes and the Sandleford Farm Partnership			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	YES
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	No			
If YES, are you...	Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	c/o Rebecca Fenn-Tripp Bloor Homes Southern Ltd [REDACTED]			
Has the landowner (or each owner) indicated support for development of the land?	Yes			

Part 2: Information on site deliverability

1. Site details		
Site address	Sandleford Park East, Land South of Monks Lane, West of A339	
Number of residential units proposed	Net additional units	Up to 1,000
	Gross (total) units	Up to 1,000

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes Ref: 20/01238/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	

	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Various Discharge of Conditions applications submitted and to be submitted 2023/24. First application for the approval of reserved matters 2024
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A. See above
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, first Discharge of Conditions application submitted October 2023. Works ongoing to submit all other prior to reserved matters conditions.	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No, but under option (see below)
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes, to be developed by Bloor Homes Limited
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes, Bloor Homes Limited
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes, Bloor Homes Limited has an option agreement in place.

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
No physical development has yet taken place. Start on site anticipated 2025.

5. Anticipated annual build out rates		
Up to 2041	2023/24	0
	2024/25	0
	2025/26	50
	2026/27	100
	2027/28	100
	2028/29	100
	2029/30	100
	2030/31	100
	2031/32	100
	2032/33	100
	2033/34	100
	2034/35	100

	2035/36	50
	2036/37	0
	2037/38	0
	2038/39	0
	2039/40	0
	2040/41	0
Beyond 2041		0

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

Planning and Technical approvals process are the key constraints on development moving forward promptly.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No.

8. Are you actively considering alternative types of development for the site? Please give details

Local Centre and Primary School to be provided on site as per outline planning permission. Both to be developed by a third party.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

Bloor Homes Limited continues to be committed to working with WBC to bring this site forward in a timely manner. Discussions on programmes for the submission of Discharge of Conditions are ongoing with WBC. The decrease from 1,080 units on last year's 5YHLS to 1,000 this year reflects the exclusion of the 80-bed extra care facility which Bloor Homes Limited do not wish to deliver. This will be subject to separate discussions with WBC.

Demand for housing remains strong within the area.

10. Additional comments

N/A

Completed by: Robert White

Position: Director

Organisation: White Peak Planning Limited

Date: 23/11/23

Sandleford Park West

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Henny Handley			
Organisation (if relevant)	Turley			
Representing (if applicable)	Donnington New Homes			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other (please specify)			

2. Ownership details			
Are you the current owner of the site?	No.		
If YES, are you...	Sole owner	<input type="checkbox"/>	Part owner
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	Donnington New Homes [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]		
Has the landowner (or each owner) indicated support for development of the land?	Yes		

Part 2: Information on site deliverability

1. Site details		
Site address	Sandleford Park West	
Number of residential units proposed	Net additional units	
	Gross (total) units	360

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Application 23/01585/OUTMAJ is pending consideration. Site is allocated for residential development.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. To be pursued once outline consent has been obtained.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. N/A
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes.
Is the site owned by a developer?	Yes.

Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes.
Is the site currently for sale or being marketed by a land agent?	No.
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>The site is allocated in the Local Plan for development and an outline planning application is pending consideration.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	
	2024/25	
	2025/26	30
	2026/27	60
	2027/28	60
	2028/29	60
	2029/30	60
	2030/31	60
	2031/32	30
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? *Please give details*

No.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No.

8. Are you actively considering alternative types of development for the site? *Please give details*

No.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No.

10. Additional comments

N/A

Completed by: Henny Handley

Position: Associate Director

Organisation: Turley

Date: 07/12/2023

**Housing Site Allocations Development Plan Document Allocations
Stratfield Mortimer Neighbourhood Development Plan Allocation**

HSA1
Land north of Newbury College, Monks Lane, Newbury

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Cole Bates			
Organisation (if relevant)	Feltham Properties Ltd			
Representing (if applicable)				
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?				

Part 2: Information on site deliverability

1. Site details		
Site address	Land North of Just Learning Nursery, Monks Lane, Newbury	
Number of residential units proposed	Net additional units	
	Gross (total) units	31
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Planning application 23/01732/OUTMAJ submitted July 2023.

Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
A series of pre-app consultations have been undertaken throughout 2023. Planning application 23/01732/OUTMAJ submitted July 2023. Negotiation ongoing with West Berkshire Planning Officers.

5. Anticipated annual build out rates		
Up to 2041	2023/24	
	2024/25	31
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	

	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No.

8. Are you actively considering alternative types of development for the site? Please give details

No.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

We, like many others, are experiencing delay in resolving the current planning application. There is a poor level of consultee engagement in West Berkshire and this complicates matters for Planning Officers and applicants alike.

10. Additional comments

The site is entirely within settlement and therefore has presumption in favour of development. Part of the site is the HSA1 allocation and is therefore part allocated for residential development.

Completed by: Cole Bates

Position: Land & Planning

Organisation: Feltham Properties Ltd

Date: 29-11-2023

HSA2
Land at Bath Road, Speen, Newbury

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Georgina Mortimer			
Organisation (if relevant)	David Wilson Homes Southern			
Representing (if applicable)	David Wilson Homes Southern			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner		A Planning Consultant	
	A Public Land-owning Body		A Land Agent	
	A Registered Social Landlord		A Developer	X
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	X	Part owner	
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	n/a			
Has the landowner (or each owner) indicated support for development of the land?	n/a			

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Bath Road, Speen, Newbury; and Land Off Lambourn Road, Speen, Newbury	
Number of residential units proposed	Net additional units	118
	Gross (total) units	118

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	17/02092/OUTMAJ (93 dwellings); and 17/02093/OUTMAJ (14 dwellings)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	22/01235/RESMAJ (93 dwellings); and 23/00373/RESMAJ (14 dwellings) both pending determination (extension of time agreed to 12 th Jan 2024).
Does the site have full planning permission?	Yes. Please provide the planning application reference	17/02092/OUTMAJ (11 dwellings)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live Section 73 application 23/00397/OUTMAJ pending determination (extension of time agreed to 12 th Jan 2024).
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	17/02092/OUTMAJ (93 dwellings) <ul style="list-style-type: none"> - Discharged <ul style="list-style-type: none"> • 22/00889/COND6 - condition 10 • 22/00890/COND7 – condition 17 • 20/03032/COND1 - condition 32 - Submitted, and informally agreed (had been waiting on outcome of nutrient neutrality concerns which is now resolved) – can now be discharged <ul style="list-style-type: none"> • 21/03239/COND2 - conditions 20, 21, 22, 23, 24, 48 • 22/00877/COND4 - conditions 28, 30 • 22/00878/COND5 - condition 35 	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Anticipated site start July 2024.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	0
	2024/25	10
	2025/26	30
	2026/27	30
	2027/28	30
	2028/29	18
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? <i>Please give details</i>
<p>Economic market conditions.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

n/a

Completed by: Georgina Mortimer

Position: Planning Manager

Organisation: David Wilson Homes Southern

Date: 27th November 2023

HSA 13
Land adjacent to Bath Road and Dorking Way, Calcot

From: [Abi Peacock](#)
To: [PlanningPolicy](#)
Subject: RE: REMINDER - Examination of the West Berkshire Local Plan Review – Update on the Deliverability of Sites and Five Year Housing Land Supply (Bath Road and Dorking Way, Calcot)
Date: 04 December 2023 10:59:13

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Good Morning,

There is a live application on the site under planning application ref. 23/00117/OUTMAJ. We are simply awaiting the completion of the S106 which was instructed by the Case Officer in April however the Council's legal department have been incredibly slow holding up the determination of the application.

Kind Regards
Abi

Abi Peacock MRTPI

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



If you are not the intended recipient of this email, please notify the sender. The contents of this email may contain a virus which could damage your computer. Whilst reasonable precautions have been taken to minimise this risk, we cannot accept liability for any damage which you suffer as a result of a virus. You should carry out your own virus checks before opening any attachment. If you wish to see our privacy policy or know about how we hold data, please follow this link to our website <http://walsinghamplanning.co.uk/resources/privacy-policy>

From: PlanningPolicy <PlanningPolicy@westberks.gov.uk>
Sent: Wednesday, November 29, 2023 4:09 PM
To: Abi Peacock [REDACTED]
Subject: REMINDER - Examination of the West Berkshire Local Plan Review – Update on the Deliverability of Sites and Five Year Housing Land Supply (Bath Road and Dorking Way, Calcot)

Dear Abi,

Further to the email we sent to you on 9 November 2023, we are contacting you to ask that you please complete the attached site deliverability form which will inform the update to the Council's Five Year Housing Land Supply. The completion of the site deliverability form is essential to ensure that that our assessment of the deliverability of your site is robust.

Since our original email, the Planning Inspector who is conducting the independent examination of the [West Berkshire Local Plan Review](#) has published his [matters, issues and questions](#), which will be the focus of the examination. Several questions relate to

the deliverability of sites which form part of the housing supply over the Local Plan Review period. The information that you provide in the site deliverability form will be essential in assisting the Council prepare responses to the Inspector.

We would be grateful if you could please complete and return the attached site deliverability form to the Planning Policy Team by **5pm on Wednesday 6 December 2023**. We may follow up with a phone call should we not hear back from you.

Thank you for your time in advance, and we look forward to receiving your response shortly.

Kind regards,

Planning Policy

West Berkshire Council, Market Street, Newbury, RG14 5LD
01635 519 111 | planningpolicy@westberks.gov.uk
www.westberks.gov.uk/planningpolicy

From: Vivian Ko [REDACTED]
Sent: Thursday, November 9, 2023 3:12 PM
To: [REDACTED]
Cc: PlanningPolicy <PlanningPolicy@westberks.gov.uk>
Subject: RESPONSE REQUIRED - West Berkshire Council Five Year Housing Land Supply (Bath Road and Dorking Way, Calcot)
Importance: High

Dear Abi,

West Berkshire Council are commencing an update of the five year housing land supply. National planning policy requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.

In order to ensure that the Council's assessment of the deliverability of sites is robust, we would be grateful if you could **please complete the attached form** for the following site, and return it by email to the Planning Policy Team by **5pm on Friday 24 November 2023**:

- Site name: Land adjacent to Bath Road and Dorking Way, Calcot
- Planning application ref: 23/00117/OUTMAJ

If you are no longer the agent for the site we would be grateful if you could let us know and, if possible, who to contact for information regarding the delivery of the site.

If you have any queries about this request, please do not hesitate to get in touch.

With thanks in advance.

Kind regards,
Vivian

Vivian Ko

HSA 14
Field between A340 & The Green, Theale

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Scott Cromack c/o Croudace Homes			
Organisation <i>(if relevant)</i>	Croudace Homes			
Representing <i>(if applicable)</i>	As above			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	-			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details			
Are you the current owner of the site?	Yes		
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.			
Has the landowner (or each owner) indicated support for development of the land?			

Part 2: Information on site deliverability

1. Site details		
Site address	Field between A340 & The Green, Theale	
Number of residential units proposed	Net additional units	
	Gross (total) units	104
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes (Outline planning permission ref: 19/01172/OUTMAJ)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes (Reserved matters planning permission ref: 23/00790/RESMAJ)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	NA
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – discharge of planning conditions is currently in progress	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	NA
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	NA

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Start on site Late Autumn / Early Winter 2023

5. Anticipated annual build out rates		
Up to 2041	2023/24	0
	2024/25	37
	2025/26	52
	2026/27	15
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? *Please give details*

None anticipated at present

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

None anticipated at present

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

NA

Completed by: Scott Cromack

Position: Senior Architect

Organisation: Croudace Homes

Date: 20 November 2023

HSA 15

Land adjoining Pondhouse Farm, Clay Hill Road, Burghfield Common

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Ed Barton			
Organisation (if relevant)	Croudace Homes			
Representing (if applicable)	Croudace Homes			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner		A Planning Consultant	
	A Public Land-owning Body		A Land Agent	
	A Registered Social Landlord		A Developer	x
	Other (please specify)			

2. Ownership details			
Are you the current owner of the site?	Yes		
If YES, are you...	Sole owner	x	Part owner
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.			
Has the landowner (or each owner) indicated support for development of the land?			

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Clayhill Lane, Burghfield Common	
Number of residential units proposed	Net additional units	
	Gross (total) units	100

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes, 22/00325/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability (<i>please give details</i>)
--

Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*)

Works have commenced on site, the site is an active construction site

5. Anticipated annual build out rates

Up to 2041	2023/24	
------------	---------	--

	2024/25	49
	2025/26	51
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? *Please give details*

N/a

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

N/a

8. Are you actively considering alternative types of development for the site? *Please give details*

N/a

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

N/a

10. Additional comments

Completed by: Ed Barton

Position: Senior Land Negotiator

Organisation: Croudace Homes

Date: 13th December 2023

HSA16
Land to the rear of The Hollies, Burghfield Common

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Richard Barter			
Organisation (if relevant)	T A Fisher & Sons			
Representing (if applicable)	T A Fisher & Sons			
Address	<div></div>			
Telephone	<div></div>			
Email	<div></div>			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	No			
If YES, are you...	Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	<div></div> <div></div> <div></div>			

	<div></div> <div></div> <div></div>
Has the landowner (or each owner) indicated support for development of the land?	Yes

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the Rear of The Hollies, Reading Road, Burghfield Common, Berkshire,	
Number of residential units proposed	Net additional units	32
	Gross (total) units	32

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes, granted at appeal under APP/W0340/W/22/3312261
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Appeal decision subject to current Judicial Review by the High Court.

Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
None. Appeal Granted on 8th August 2023. Currently subject to Judicial Review so no work on site will commence until that is resolved.

5. Anticipated annual build out rates		
Up to 2041	2023/24	
	2024/25	
	2025/26	
	2026/27	20
	2027/28	12
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	

	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

CIL rates / indexation

Increase in build costs affecting viability

BNG Requirements

Updates and requirements of the DEPZ and/or Offsite Emergency Plan

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

No

10. Additional comments

N/A

Completed by: Richard Barter

Position: Land and Planning Manager

Organisation: T A Fisher & Sons Ltd

Date: 10.11.2023

HSA 19
Land adjoining Lynch Lane, Lambourn

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Rebecca Sleaf			
Organisation <i>(if relevant)</i>	Hygrove Property Services Ltd			
Representing <i>(if applicable)</i>	Hygrove Holdings Ltd			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	Representing the owner of the site – Hygrove Holdings Ltd			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	N/a – in sole ownership			
Has the landowner (or each owner) indicated support for development of the land?	N/a – in sole ownership			

Part 2: Information on site deliverability

1. Site details		
Site address	Land adjoining Lynch Lane, Lambourn, Hungerford, Berkshire, RG17 8QG	
Number of residential units proposed	Net additional units	90
	Gross (total) units	90
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/a

	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below 'Site Promotion Activity : Summary' for detailed information.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Does the site have full planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/a	

Site Promotion Activity : Summary

The applicant has engaged in pre-application discussions with the Local Planning Authority (pre-application reference: 20/00093/PREAPP). These have confirmed that the site is currently allocated within the Housing Site Allocations Development Plan Document (HSA DPD May 2017) so the principle of development is in accordance with Policy HSA19 and acceptable in policy terms. The pre-application response has recognised that further design work, to finalise an appropriate layout (and establish a sustainable number of units) in line with the Local Planning Authority's feedback, is needed. In response to this, the applicant is currently undertaking further design work / due diligence to revise the proposals. This is in order to front-load any requirements, to ensure the planning application process is straightforward – this underpins the applicant's aspiration to achieve a timely, favourable determination and commence development on the site to deliver much-needed residential development.

During the pre-application process, a positive response was also received from West Berkshire Council's Highways department. This response posed no objections in principle to the development proposals and recognised the allocated, thus acceptable-in-principle, nature of the site. Similarly, the Highways Department supported the provision of two access points serving the development. In this way, the acceptable nature of the site from a highways perspective, is evident. Whilst recognising that the quantum of development sought by the applicant is larger than the quantum of units allocated for development in the HSA DPD (May 2017), it must be noted that no objections have been raised by the Highways Department on unit numbers. As opposed to objecting the Highway Department recommended the preparation of documentation to support a formal planning application (including a Transport Assessment, Travel Plan etc) to inform and justify the proposals.

In light of the positive feedback received from both the Local Planning Authority and the Highways Department, demonstrating the readily available nature of the site and its lack of constraints, the applicant is working on a scheme to take into account the comments received during the pre-application exercise. This work, which will be finalised imminently, will be incorporated into the layout submitted as part of the formal planning application. As the site is not subjected to planning constraints, and can readily accommodate residential development, the applicant is undertaking this substantial amount of work at this stage to front-load any planning requirement as much as possible. This is not only to ensure the robustness

of the proposals but, ultimately, seeks to minimise delays in light of the unprecedented pressures Local Planning Authorities are experiencing.

The applicant is looking to submit a planning application imminently and commence work on site within the next year / as soon as planning permission is achieved. The sole issue to resolve is the capacity of, and yield of, the site (unit numbers).

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes- Hygrove Holdings Ltd
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – Hygrove Holdings Ltd is looking to develop the site themselves
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes- Hygrove Holdings Ltd
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
<p>In light of the disruption caused by the pandemic, it is evident that the applicant's aspirations for the site have been somewhat delayed due to the unprecedented nature of the global events both the public and private sector have been subjected to. Notwithstanding this, as outlined in Section 2 (Planning Status) of this document, the applicant has spent time engaging in pre-application discussions with the Local Planning Authority.</p> <p>Further delay has been caused by the emergence of the Nitrate issue; Engineers have been appointed to advise on the effect this will have on the site. The applicant awaits confirmation of the draft scheme proposed by the Engineers appointed. At present, the applicant is finalising the design element of the proposals to accommodate the scheme proposed to tackle the Nitrate issue.</p> <p>It is, therefore, anticipated that a planning application will be submitted early in the New Year, and for development on site to begin within the next year, subject to a planning consent being issued.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	N/A
	2024/25	15
	2025/26	30
	2026/27	30
	2027/28	15
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

There are no issues affecting the achievability, economic viability or timing of the development of this site. The site is fully owned and controlled by the Developers who are committed to securing planning permission / developing the site and, crucially, have the funds to do so. Given the inherent financial viability of any scheme brought forward, the uncomplicated ownership position and the allocation of the site for residential development, the site benefits from realistic prospects of being delivered within the plan period.

As recognised in Section 4 (Development Progress) of this site, whilst the Covid-19 pandemic has not impacted on the delivery of this site, it is evident that delays have been experienced across both the public and private sector not least in obtaining a pre-application response from the Local Planning Authority (July 2020) to the formal enquiry submitted by the applicant (May 2020). This exercise, the aim of which was to obtain a steer from the Local Planning Authority regarding the principle of development on the site took over three months. Whilst completely understandable, in light of the circumstances, it is evident that these delays have impacted upon the applicant's timescales. As also stated the delivery of the site has been affected by the emergence of the Nitrate issue especially given the proximity of the river Lambourn. Whilst this will not impact on the viability of the site additional investigation and Engineering work has been required to ensure no adverse ecological impact.

For these reasons, to avoid being subjected to further delays, the applicant is now effectively front-loading a formal planning application submission to ensure all due diligence is undertaken and that the determination process can be as streamlined as possible in order to deliver much-needed new housing.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No – the applicant is committed to delivering high-quality residential development on site and is finalising the layout for the formal planning application in the interest of best-practice and a favourable determination for the proposals.

8. Are you actively considering alternative types of development for the site? Please give details

No – the site is suited for housing, as allocated.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

Overall, in light of the above, it is evident that the applicant is committed to working with the Local Planning Authority to deliver a comprehensive sustainable development, providing much-needed homes in West Berkshire. Ultimately, the site is suitable, available for development and considered to be in a sustainable location for residential development – this is demonstrated by the feedback received during the pre-application exercise, both by the Local Planning Authority and the Highways Department, and its current allocation in the HSA DPD (May 2017) which must be retained in the interest of residential delivery. It is not considered that the site has any constraints which could restrict development despite the ongoing effects of the Covid-19 pandemic and nitrate issue – instead, the applicant has utilised the delays experienced to engage in pre-application discussions, finalise a robust layout in line with the local planning authority's aspirations, and to (imminently) submit a formal planning application. This is in order to commence development on the site as soon as possible so that this viable site can make a meaningful contribution to West Berkshire in terms of housing provision as well as associated health, wellbeing and community benefits in line with local and national Planning Policy.

10. Additional comments

The site is suitable, available, viable and deliverable for much needed housing.

Completed by: Rebecca Sleap
Position: Planning Officer
Organisation: Hygrove Property Services Ltd
Date: 20th November 2023

HSA24
Land off Charlotte Close, Hermitage

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Ross Stewart			
Organisation (if relevant)	Deanfield Homes			
Representing (if applicable)				
Address	<div></div>			
Telephone				
Email	<div></div>			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	YES
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	YES			
If YES, are you...	Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?				

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Charlotte Close, Hermitage, RG18 9TU	
Number of residential units proposed	Net additional units	16
	Gross (total) units	16

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	20/00912/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Nutrient Neutrality is obstructing the discharge of some of the planning conditions.	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	n/a
Is the site owned by a developer?	YES
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	YES
Is the site currently for sale or being marketed by a land agent?	NO
Is there current interest from a developer?	NO
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	NO

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
<p>Site is secure and hoarded. We have completed our GCN mitigation and have submitted 23/02585/COND.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	
	2024/25	
	2025/26	16
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? <i>Please give details</i>
<p>Nutrient Neutrality and a lack of mitigation options from West Berkshire District Council or Natural England.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>

8. Are you actively considering alternative types of development for the site? *Please give details*

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: Ross Stewart

Position: Senior Land Manager

Organisation: Deanfield Homes

Date: 21/11/2023

HSA25

Land to the south east of the Old Farmhouse, Hermitage

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Richard Barter			
Organisation <i>(if relevant)</i>	T A Fisher & Sons			
Representing <i>(if applicable)</i>	T A Fisher & Sons			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
	A Private Landowner		A Planning Consultant	
	A Public Land-owning Body		A Land Agent	
	A Registered Social Landlord		A Developer	X
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	X	Part owner	
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?				

Part 2: Information on site deliverability

1. Site details		
Site address	Old Farmhouse, Newbury Road, Hermitage	
Number of residential units proposed	Net additional units	21
	Gross (total) units	21
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Outline. 19/02993/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Reserved Matters submitted and currently being determined under 21/02923/RESMAJ
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Conditions relating to Outline permission 19/02993/OUTMAJ submitted, and being determined under 21/03264/COND1, 22/00129/COND2, and 22/00330/COND3.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
None. Reserved matters approval awaited.

5. Anticipated annual build out rates		
Up to 2041	2023/24	
	2024/25	
	2025/26	11
	2026/27	10
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

Reserved Matters approval, currently being delayed due to Nitrate Neutrality issues within the River Lambourne SAC.

Biodiversity requirements / Timings

CIL rate

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

An alternative solution to the Drainage issue was submitted to the Council in June 2023. No response has been forthcoming from either the Councils Ecologist or Drainage officers despite repeated chasing, and the planning officer cannot make a decision on the application without their feedback. All other matters relating to the application are acceptable as confirmed by the Planning Officer.

The submitted solution dealt with the phosphates on site so that there was no increase in nitrates/phosphates going off site over that produced by the current situation (i.e. the undeveloped site). This application is thus held up due to the unwillingness of the councils' officers to review the proposals and make a decision.

10. Additional comments

N/A

Completed by: Richard Barter

Position: Land and Planning Manager

Organisation: TA Fisher & Sons

Date: 10.11.2023

Stratfield Mortimer Neighbourhood Plan Allocation
Land to the south of St. John's School, The Street, Mortimer

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name				
Organisation (if relevant)	T A Fisher & Sons Ltd			
Representing (if applicable)				
Address	<div></div>			
Telephone	<div></div>			
Email	<div></div>			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner or representing the owner of the site?				
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the South of The Street, Mortimer Common	
Site size (ha)		
Number of residential units proposed	Net additional units	110
	Gross (total) units	110
	Number of Affordable Homes	44

2. Planning status			
Is the site allocated in the Development Plan?	Yes	x	No
Does the site have planning permission?			Application Reference
	Outline		17/03004/OUTMAJ
	Reserved Matters		Phase 1 (28 of 110) Approved Phase 2a (16 of 110) Approved Phase 2b (14 of 110) Approved Phase 3 (52 of 110) Approved
	Full		
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.	Phase 1, 2a, 2b & 3 all approved (110 of 110)		
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Conditions on Phase 2a & 2b discharged		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	

Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	
--	--

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Phase 1 (28 units) build complete. Phase 2a (16 units) complete. Phase 2b (14 units) nearing completion. Phase 3 just commenced.

5. Anticipated annual build out rates (1 April to 31 March)		
Up to 2025	2020/21	0
	2021/22	11
	2022/23	23
	2023/24	26
	2024/25	14
	2025/26	26
Post 2026	2026 – 2031	10
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies

Position: Director

Organisation: T A Fisher & Sons

Date: 29th November 2023

Large and Medium Sites with Planning Permission at March 2023

18/03061/RESMAJ

14/02480/OUTMAJ

Land adjacent to Hilltop, Oxford Road, Donnington, Newbury: West

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Georgina Mortimer			
Organisation (if relevant)	David Wilson Homes Southern			
Representing (if applicable)	David Wilson Homes Southern			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	n/a			
Has the landowner (or each owner) indicated support for development of the land?	n/a			

Part 2: Information on site deliverability

1. Site details		
Site address	Land Adjacent To Hilltop, Oxford Road, Donnington, Newbury	
Number of residential units proposed	Net additional units	222
	Gross (total) units	222

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	19/00442/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	20/02788/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	<p>Discharged</p> <ul style="list-style-type: none"> Outline conditions 1, 2, 4, 5, 10, 11, 14, 18, 20, 28, 30, 31, 33 RM conditions 4, 9, 17, 18 <p>Submitted, and informally agreed (see below)*</p> <ul style="list-style-type: none"> Outline conditions 21, 23, 27 <p>Submitted and amendments needed</p> <ul style="list-style-type: none"> Outline conditions 22, 24 RM conditions 6, 7, 8, 12, 14, 15 <p>*Many conditions informally agreed but WBC awaiting resolution on Taylor Wimpey RM in respect of nutrient neutrality before issuing decisions. DWH will be seeking legal opinion on this.</p>	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Site is under construction with a number of occupations.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	40
	2024/25	35
	2025/26	35
	2026/27	35
	2027/28	32
	2028/29	
	2029/30	

	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

Economic market conditions.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

n/a

Completed by: Georgina Mortimer

Position: Planning Manager

Organisation: David Wilson Homes Southern

Date: 27th November 2023

**04/01219/FULMAJ
15/02842/OUTMAJ
20/00663/RESMAJ
22/01933/RESMAJ (9 dwellings)
21/03256/RESMAJ (290 dwellings)
Lakeside, Theale**

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Emma Runesson			
Organisation <i>(if relevant)</i>	Ridgepoint Homes & Ebury Property Limited			
Representing <i>(if applicable)</i>	N/A			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	N/A			
Has the landowner (or each owner) indicated support for development of the land?	N/A			

Part 2: Information on site deliverability

1. Site details		
Site address	Lakeside, The Green, Theale RG7 5DR	
Number of residential units proposed	Net additional units	281
	Gross (total) units	281

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes - 15/02842/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes - 21/03256/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	22/01871/FULEXT – decision pending and expected imminently before Christmas 2023
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – final pre-commencement conditions pending determination and decision expected imminently	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A – owned by a developer
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Phase 1 comprising 7 units have commenced.</p> <p>Development on the wider site is expected to commence in January 2024.</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	30
	2024/25	60
	2025/26	60
	2026/27	60
	2027/28	60
	2028/29	11
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? <i>Please give details</i>
Not anticipated at present.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No.

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

N/A.

10. Additional comments

Completed by: Emma Runesson

Position: Planning Manager

Organisation: Ridgpoint Homes on behalf of Ebury Property Limited

Date: 22/11/23

Appendix 4 – Latest Housing Trajectory

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

West Berkshire Council response to AP78

Housing land supply identified in the Plan

AP78. Council to update the housing trajectory in EXAM22 to take account of all relevant subsequent action points and proposed modifications, including those in response to this note.

Council response

The updated housing trajectory (Appendix 8 of the submission Plan), is included within Appendix A. It covers the Plan period of 2023/24 to 2040/41.

Text and numbers shown in red identify the changes since the previous iteration of the housing trajectory, which was included within Appendix B of [EXAM22](#). The updated trajectory takes account of all relevant Action Points and Proposed Main Modifications, including the proposed additional deliverable sites and broad locations in relation to [IN30](#). Other aspects of the housing trajectory remain unchanged.

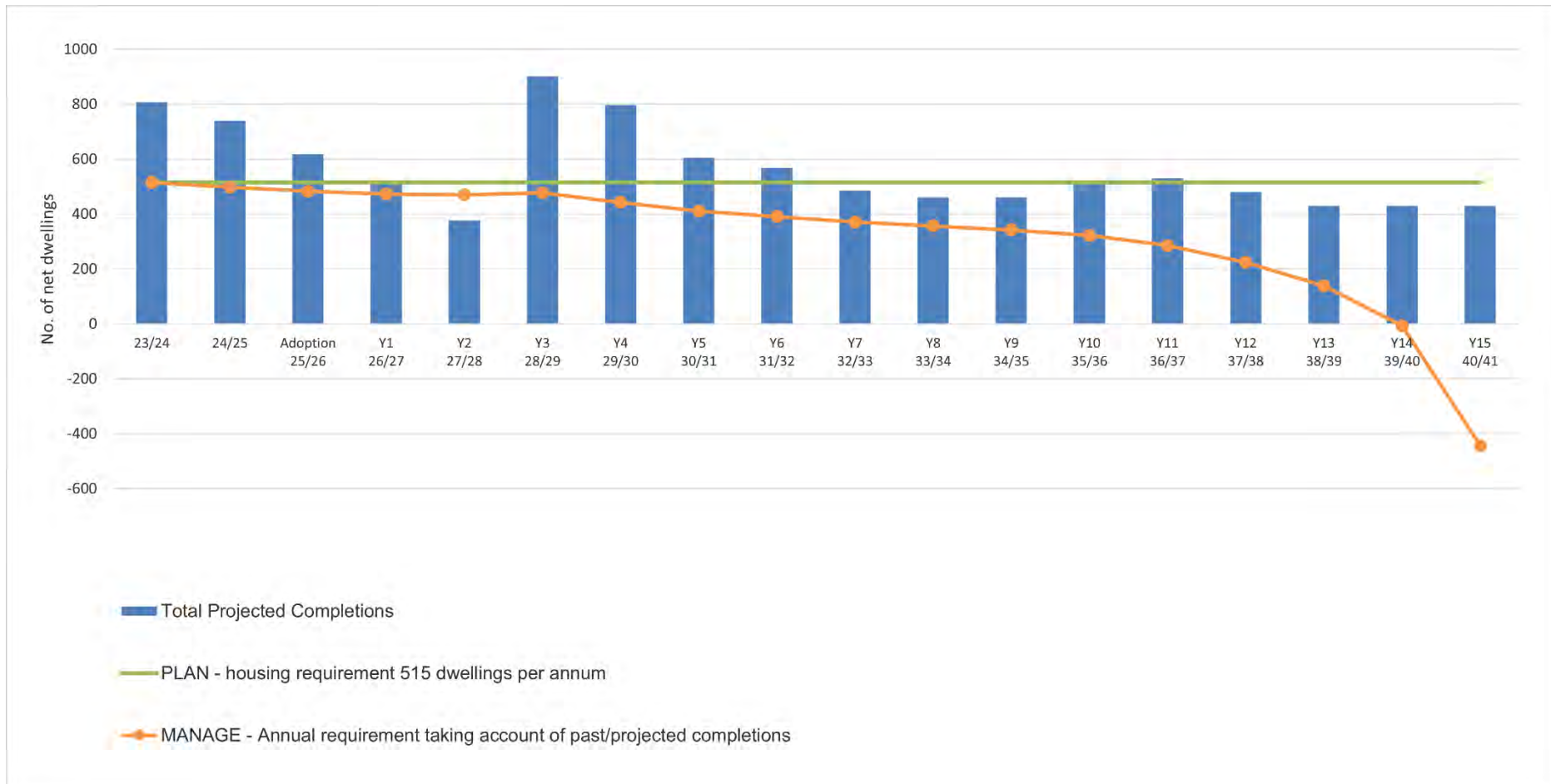
The anticipated rate of development for the proposed additional deliverable sites have been informed by site deliverability forms completed by site promoters. These are included within Appendix B.

1

	Planning status at 31 March 2023	Submission 22/23	23/24	24/25	Adoption 25/26	Y1 26/27	Y2 27/28	Y3 28/29	Y4 29/30	Y5 30/31	Y6 31/32	Y7 32/33	Y8 33/34	Y9 34/35	Y10 35/36	Y11 36/37	Y12 37/38	Y13 38/39	Y14 39/40	Y15 40/41	TOTAL	Reason for change
Retained allocations in the Local Plan and Stratfield Mortimer NDP allocations																						
SP16 Sandleford Park Newbury - East	Outline permission		0	0	0	0	50	100	100	100	100	100	100	100	100	50	0	0	0	0	1000	To reflect the removal of 80 extra care homes for affordable housing
SP16 Sandleford Park Newbury - West	No permission		0	0	0	0	0	50	50	50	50	50	50	50	50	50	50	0	0	0	500	
RSA1 - Land north of Newbury College, Monks Lane, Newbury	Permission lapsed		0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15	To correct numbering error
RSA2 - Land at Bath Road, Speen, Newbury	Outline permission on 107 units Full permission on 11 units		0	0	10	30	30	18	0	0	0	0	0	0	0	0	0	0	0	0	118	
RSA3 - Land at Coley Farm, Stoney Lane, Newbury	Full permission		0	0	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	75	
RSA4 - Land off Greenham Road and New Road, South East Newbury	Under construction		0	0	50	50	57	0	0	0	0	0	0	0	0	0	0	0	0	0	157	
RSA5 - Land at Lower Way, Thatcham	Full permission		0	0	30	50	11	0	0	0	0	0	0	0	0	0	0	0	0	0	91	
RSA7 - 72 Purley Rise, Purley on Thames	Under construction		0	15	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29	
RSA8 - Land adjacent to Bath Road and Dorking Way, Calcot	No permission		0	0	0	0	0	10	10	15	0	0	0	0	0	0	0	0	0	0	35	
RSA9 - Land between A340 and The Green, Theale	Full permission		0	0	37	52	15	0	0	0	0	0	0	0	0	0	0	0	0	0	104	
RSA12 - Land adjoining Pondhouse Farm, Clayhill Road, Burghfield	Full permission		0	0	49	51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100	
RSA14 - Land adjoining Lynch Lane, Lambourn	No permission		0	0	0	0	0	20	20	20	0	0	0	0	0	0	0	0	0	0	60	
RSA15 - Land at Newbury Road, Lambourn	Full permission		0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	8	
RSA18 - Pirbright Institute Site, High Street, Compton	Outline permission		0	0	0	0	0	50	50	50	10	0	0	0	0	0	0	0	0	0	160	
RSA20 - Land off Charlotte Close, Hermitage	Full permission		0	0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	16	
RSA21 - Land to the south east of the Old Farmhouse, Hermitage	Outline permission		0	0	0	0	0	11	10	0	0	0	0	0	0	0	0	0	0	0	21	
RSA24 - Land Adjacent To New Stocks Farm, Paices Hill, Aldermaston	Full permission		0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	
SMNDP - Land to the south of St John's School, The Street, Stratfield Mortimer	Under construction		24	26	14	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	58	
Subtotal: Retained allocations in the Local Plan and Stratfield Mortimer NDP allocations			24	41	237	276	196	130	290	240	235	160	150	150	150	100	50	0	0	0	2555	

	Planning status at 31 March 2023	Submission 22/23	23/24	24/25	Adoption 25/26	Y1 26/27	Y2 27/28	Y3 28/29	Y4 29/30	Y5 30/31	Y6 31/32	Y7 32/33	Y8 33/34	Y9 34/35	Y10 35/36	Y11 36/37	Y12 37/38	Y13 38/39	Y14 39/40	Y15 40/41	TOTAL	Reason for change
Proposed New Allocations																						
SP17 North East Thatcham	No permission	0	0	0	0	0	0	0	0	60	170	170	170	170	170	170	170	170	170	170	1760	To reflect the capacity of site for up to 2500 dwellings and lead-in time and built-out rate accordingly based on the latest evidence
RSA10 - Whitehart Meadow, Theale	No permission	0	0	0	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	40	
RSA11 - Former sewage treatment works, Theale	No permission	0	0	0	0	0	0	30	30	0	0	0	0	0	0	0	0	0	0	0	60	
RSA13 - Land north of A4 Bath Road, Woolhampton	No permission	0	0	0	0	0	0	8	8	0	0	0	0	0	0	0	0	0	0	0	16	
RSA16 - Land north of South End Road, Bradfield Southend	No permission	0	0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	20	
RSA17 - Land at Chieveley Glebe	No permission	0	0	0	0	0	0	5	10	0	0	0	0	0	0	0	0	0	0	0	15	
RSA19 - Land west of Spring Meadows, Great Shefford	No permission	0	0	0	0	0	0	8	7	0	0	0	0	0	0	0	0	0	0	0	15	
RSA22 - Land adjacent Station Road, Hermitage	No permission	0	0	0	0	0	0	15	15	12	0	0	0	0	0	0	0	0	0	0	42	To reflect the revised capacity of site
RSA23 - Land adjacent The Haven, Kintbury	No permission	0	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	20	
Henwick Park, Bowling Green Road, Thatcham	No permission	0	0	0	0	0	0	50	50	50	50	25	0	0	0	0	0	0	0	0	225	Proposed new site
Regency Park Hotel, Bowling Green Lane, Thatcham	No permission	0	0	0	0	0	0	20	25	0	0	0	0	0	0	0	0	0	0	0	45	Proposed new site
Land at Pincents Lane, Tilehurst	No permission	0	0	0	0	0	0	50	50	38	0	0	0	0	0	0	0	0	0	0	138	Proposed new site
Land north of Pangbourne Hill, Pangbourne	No permission	0	0	0	0	0	0	12	13	0	0	0	0	0	0	0	0	0	0	0	25	Proposed new site
Broad location - Area to the north of Newbury	No permission	0	0	0	0	0	0	0	0	0	0	0	0	0	50	120	120	120	120	120	650	Proposed broad location
Site to be allocated in Hungerford Neighbourhood Development Plan	No permission	0	0	0	0	0	0	20	20	15	0	0	0	0	0	0	0	0	0	0	55	
Site to be allocated in Lambourn Neighbourhood Development Plan	No permission	0	0	0	0	0	0	10	10	5	0	0	0	0	0	0	0	0	0	0	25	
Subtotal: Proposed New Allocations		0	0	0	0	0	0	278	268	180	220	195	170	170	220	290	290	290	290	290	3151	
Windfall allowance		0	0	0	66	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	2166	
Existing planning commitments for C2 Use Class communal accommodation		2	24	36	28	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	91	
Total Past Completions		640																				
Total Projected Completions			807	739	619	515	376	902	797	605	568	485	460	460	510	530	480	430	430	430	10143	
Cumulative Completions (A)			807	1546	2165	2680	3056	3958	4755	5360	5928	6413	6873	7333	7843	8373	8853	9283	9713	10143		
PLAN - housing requirement 515 dwellings per annum			515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	
Cumulative requirement (using 515 dpa) (B)			515	1030	1545	2060	2575	3090	3605	4120	4635	5150	5665	6180	6695	7210	7725	8240	8755	9270		
MONITOR - No. of dwellings above or below housing requirement (A-B)			292	516	620	620	481	868	1150	1240	1293	1263	1208	1153	1148	1163	1128	1043	958	873		
MANAGE - Annual requirement taking account of past/projected completions			515	498	483	474	471	478	443	410	391	371	357	342	323	285	224	139	-7	-443		

Housing Trajectory 2022/23 – 2040/41



Appendix B: Site deliverability forms

Contents

- CA12 – Land at Henwick Park, Bowling Green Road, Thatcham
- CA17 – Land east of Regency Park Hotel, Bowling Green Road, Thatcham
- PAN8 – Land north of Pangbourne Hill, Pangbourne
- TIL13 – Land at Pincents Lane, Tilehurst

CA12 – Land at Henwick Park, Bowling Green Road, Thatcham

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Jack Dickinson			
Organisation (if relevant)	Nexus Planning			
Representing (if applicable)	Croudace Homes			
Address	Croudace Western Office, 1650 Arlington Business Park, Theale, Reading, RG7 4SA			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other (please specify)			

2. Ownership details	
Are you the current owner of the site?	No, Croudace has control of the land via option agreement.
If YES, are you...	Sole owner <input type="checkbox"/> Part owner <input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	Mr A Billington, [REDACTED] Ms S Henman, [REDACTED] [REDACTED]
Has the landowner (or each owner) indicated support for development of the land?	Yes, the option agreement binds all parties to commit to the development of the land upon the grant of planning permission.

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Henwick Park (HELAA site reference CA12)	
Number of residential units proposed	Net additional units	225
	Gross (total) units	225

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	A full application is close to being finalised for submission and could be lodged with the Council in late September / early October 2024.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See above.
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application	See above.

	and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability (please give details)

Is the landowner still supportive of the development of the site?	Yes, please see response to Section 1.
Is the site owned by a developer?	The site is within the control of Croudace Homes, a reputable regional housebuilder with developments under construction or close to being commenced at Burghfield Common and Theale.
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	The site will be developed by Croudace Homes.
Is the site currently for sale or being marketed by a land agent?	No. The site will be developed by Croudace Homes.
Is there current interest from a developer?	The site will be developed by Croudace Homes.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)

Croudace has been in control of the site since the mid 2010's and has completed an abundance of technical work to inform deliverability. The delivery of up to 225 dwellings was found technically acceptable by the Inspector and the Secretary of State at appeal in 2017 (APP/WO340/W/16/3144193). An EIA Screening Opinion for up to 325 residential units confirmed, in 2023, that development the site would not have significant effects on the environment.

Croudace submitted an outline planning application in March 2023 which was subsequently withdrawn following discussions with the Council following minor technical queries from statutory consultees. However, these queries can be responded to and addressed through a future submission and Croudace is currently working with technical consultants to develop a full planning application.

Discussions have been ongoing with the Council's Development Management team to agree a Planning Performance Agreement (PPA) to shape both pre-and post-submission discussions with the relevant statutory consultees in the interests of working collaboratively to bring forward a sound application.

5. Anticipated annual build out rates

Up to 2041	2023/24	
	2024/25	
	2025/26	
	2026/27	25

	2027/28	50
	2028/29	50
	2029/30	50
	2030/31	50
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

No, the site is deliverable within the first five years from anticipated plan adoption (April 2025)

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No, the site can deliver approximately 225 dwellings in the first five years from anticipated plan adoption.

8. Are you actively considering alternative types of development for the site? Please give details

The site is most suitable for residential development.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

The site is identified within the Thatcham Growth Study (Examination documents SIT2a, SIT2b and SIT2c) as being a suitable location for growth and was only discounted as land at North East Thatcham was considered the most appropriate for strategic large scale growth of the scale required to deliver long term growth and town wide infrastructure enhancements.

Earlier in the examination the Inspector asked the Council to clarify whether there were any sites suitable and available for residential development that are not allocated within the Plan. Land at Henwick Park was identified as one of these sites, with reference made within EXAM26 to the Housing and Economic Land Availability Assessment (HELAA).

It is therefore clear that the site is suitable, available and deliverable for the development of approximately 225 dwellings, within the first five years from plan adoption.

10. Additional comments

Croudace is keen to work with the Council to develop appropriate policy wording should they decide to allocate the site and is also willing to explore the entering into of a Statement of Common Ground with the Council to set out areas of agreement regarding the site's development.

The delivery of up to 225 dwellings was found technically acceptable by the Inspector and the Secretary of State at appeal in 2017 (APP/WO340/W/16/3144193), however the appeal was dismissed on the grounds of housing land supply and the associated principle of development not being established. The scheme is deliverable and can make a contribution to the Council's housing supply trajectory in the years following adoption of the plan.

Completed by: JACK DICKINSON

[REDACTED]

Organisation: NEXUS PLANNING

Date: 09 AUGUST 2024

CA17 – Land east of Regency Park Hotel, Bowling Green Road, Thatcham

	Site Deliverability Form
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The West Berkshire Local Plan Review (LPR) is currently undergoing independent examination. Following the hearing sessions which took place between May and June 2024, the Inspector published on 30 July 2024 a [post hearing letter](#) which is focused on the North East Thatcham strategic site and the housing supply across the Plan period. The letter includes several Action Points, one of which requests the Council to identify additional deliverable sites and / or developable sites and/or broad locations.

In order to ensure that the Council's assessment of the deliverability of sites is robust, we request that site promoters / landowners / developers complete this form in as much detail as possible. You are welcome to attach any additional relevant information.

Completed forms should be returned to the Planning Policy Team at planningpolicy@westberks.gov.uk.

Please note that completed forms may be appended to the Council's response to the Inspector, however personal details will not be included. These will be kept for 5 years and then destroyed in line with our GDPR privacy statements which can be read at: <https://www.westberks.gov.uk/privacynotices>.

If you have any difficulties completing this form or if you would like further information, please call us on 01635 519 111 or email: planningpolicy@westberks.gov.uk.

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Sebastien Hung			
Organisation <i>(if relevant)</i>	Regency Homes Limited			
Representing <i>(if applicable)</i>	Planned Holdings Limited			
Address	C/o Manor of Groves, High Wych, Hertfordshire, CM21 0JU			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	YES			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?	YES			

Part 2: Information on site deliverability

1. Site details

Site address	Regency Park Hotel, Bowling Green Road, Thatcham, West Berkshire RG18 3RP	
Number of residential units proposed	Net additional units	150
	Gross (total) units	150

2. Planning status

Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No planning permission application made, but previously submitted a pre-app
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No, as above.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No, as above.
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	NA	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	YES
Is the site owned by a developer?	YES
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	YES
Is the site currently for sale or being marketed by a land agent?	NO
Is there current interest from a developer?	NA
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	NA

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

The site is owned by a developer that has is in the process of delivering 448 units over the next two years. The developer is keen to develop this land as well.

No planning permission has been granted to-date, however a pre-app was previously submitted.

If it is possible to develop this land, the developer plans to deliver the units 2-3 units from the date of the grant of planning permission.

5. Anticipated annual build out rates

Up to 2041	2023/24	
	2024/25	
	2025/26	
	2026/27	150
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

The land is wholly owned by the developer.
Additionally, the developer is well capitalised and able to execute whenever they want.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

A application incorporating a care home and residential units has previously considered. A preference for 100% residential units is preferred.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

None

10. Additional comments

NA

Completed by: Sebastien Hung

Position:



Organisation: Regency Homes Limited (representing the freeholder Planned Holdings Limited)

Date: 12 August 2024

PAN8 – Land north of Pangbourne Hill, Pangbourne

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Adam Ross			
Organisation <i>(if relevant)</i>	Nexus Planning			
Representing <i>(if applicable)</i>	Pangbourne Beaver Properties Ltd			
Address	Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	The site is owned by Pangbourne Beaver Properties Ltd			
If YES, are you...	Sole owner	<input checked="" type="checkbox"/>	Part owner	<input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	<p>Nexus Planning represents the landowner in relation to all planning matters. However, for completeness, the landowner's details are:</p> <p>Pangbourne Beaver Properties Ltd</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>			
Has the landowner (or each owner) indicated support for development of the land?	Yes - Pangbourne Beaver Properties Ltd supports the development of the site and has promoted it consistently throughout the Local Plan process.			

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the north of Sheffield Close, Pangbourne Hill, Pangbourne (Council Site Ref: PAN8).	
Number of residential units proposed	Net additional units	At least 25 units (see Section 10 for details)
	Gross (total) units	At least 25 units (see Section 10 for details)
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	<p>A pre-application submission was originally made in July 2020 (Ref: 20/00132/PREAPP) and advice was received from the Council dated 28th May 2021 (generally identifying that the focus should be on promotion of the site through the emerging Local Plan process).</p> <p>Subject to the allocation of the site in the Local Plan, the landowner intends to progress a planning application at the earliest opportunity. Technical work has already been carried out to demonstrate the site's suitability for residential development, and limited further work is required to prepare a planning application.</p>
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See above
Does the site have full planning permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See above
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes - Pangbourne Beaver Properties Ltd is still supportive of the development of the site.
Is the site owned by a developer?	Pangbourne Beaver Properties Ltd will prepare / submit a planning application and, subject to planning permission being granted, the site would be sold to a housebuilder (the same process as was successfully adopted for the Sheffield Close development immediately to the south).
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	No – see above.
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Subject to the allocation of the site for development, interest has already been expressed by some housebuilders. There is an evident need / demand for housing in this location.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No. As set out above, Pangbourne Beaver Properties Ltd will secure planning permission and then sell the site to a developer / housebuilder.

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
<p>As the site has not been allocated for development, there has been no development progress on site to date.</p> <p>However, the site has consistently been promoted through the West Berkshire Local Plan Review process by Pangbourne Beaver Properties Ltd and, as referenced above, a pre-application submission was made as long ago as 2020 (but this identified the need to promote the site through the Local Plan process).</p> <p>The Council now accepts that the site is deliverable for housing.</p> <p>Subject to the allocation of the site in the emerging Local Pan, the landowner would intend to progress a planning application at the earliest opportunity. It is anticipated that planning permission could be secured, and development built out, within 5 years (see below).</p>

5. Anticipated annual build out rates		
Up to 2041	2023/24	Note: this monitoring year has already ended.
	2024/25	
	2025/26	
	2026/27	At least 12 homes
	2027/28	At least 13 homes

	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	
Beyond 2041		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details

No.

The Council accepts that the site is deliverable for housing. The existing adopted highway within Sheffield Close can provide access from Pangbourne Hill to the site. As such, housing can be delivered in the short term.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No. In fact quite the opposite – the site is in a highly sustainable location, and the Council now accepts that it is suitable / deliverable for housing.

8. Are you actively considering alternative types of development for the site? Please give details

No. The site is promoted, and most suitable, for housing.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

The Council accepts that housing on this highly sustainable site is deliverable.

We have promoted the site for approximately 40 homes through the Local Plan process.

The Council's position is that only part of this site is suitable for housing and it can accommodate approximately 25 homes (for ease of reference see the plan that was produced by the Council at **Appendix 1** which identifies the land it considers to be suitable for development in landscape terms).

In either scenario, it is evident that the site (or part thereof) can deliver at least 25 homes, including affordable homes, within the first five years of the new Local Plan and, therefore, contribute meaningfully to boosting short-term housing supply in the district / AONB area.

This development can be delivered with very limited impact on the AONB in a well contained / well landscaped setting, and will help to contribute to the vitality and viability of existing services in Pangbourne. Existing overhead electricity cables, that are visually intrusive and detrimental to the AONB, can be placed underground in association with development, whilst an area of replacement grassland can be established to provide a biodiversity net gain of at least 10%.

The site is owned by a single landowner that wishes to see it developed without delay, and that has a track record of successfully facilitating / delivering development in the locality (see the development at Sheffield Close, immediately to the south of the site).

10. Additional comments

Given that the Council has accepted that the site is deliverable, and the Local Plan Inspector has concluded that the Council should look to identify additional deliverable sites for housing, we would welcome the opportunity to discuss the site further with Officers. **Whilst we consider that a larger area of the site is suitable for housing in landscape terms, if the Council considers that the area is more limited, such that the capacity is reduced to approximately 25 homes, we are willing to work collaboratively on that basis.**

Were the Council minded to allocate the site for development, we would be keen to discuss any proposed policy wording with Officers, and agree a Statement of Common Ground, to demonstrate to the Local Plan Inspector that the site is deliverable and is promoted / supported by a willing, experienced and active landowner.

Completed by: Adam Ross

Position:

[REDACTED]

Organisation: Nexus Planning Ltd

Date: 12th August 2024

TIL13 – Land at Pincents Lane, Tilehurst

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Mike Bodkin			
Organisation <i>(if relevant)</i>	Head of Planning TOWN			
Representing <i>(if applicable)</i>	The landowners: U and I (Pincents Lane) Ltd, part of LSU+I; in turn Land Securities. The Barron Family: Alasdair & Barbara Barron and Priscilla Platt			
Address	Reeds Wharf 33 Mill St London SE1 2AX			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>	Promoter on behalf of landowners.		

2. Ownership details				
Are you the current owner of the site?	<p>The great proportion of the site (86%) is owned by U and I (Pincents Lane) Ltd. The Barron family own 14% of the site. See plan at Appendix One. A contract for U and I (Pincents Lane) to purchase the remainder of the site from the Barron family has been agreed and is expected to complete by the end of August 2024.</p>			
If YES, are you...	Sole owner	<input type="checkbox"/>	Part owner	<input checked="" type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	<p>U and I (Pincents Lane) Ltd (company number 06464634) whose registered office is at 100 Victoria Street, London SW1E 5JL.</p> <p>Norman Alasdair Barron and Barbara Jean Barron [REDACTED] [REDACTED] and Priscilla Mary Platt [REDACTED]</p>			

Has the landowner (or each owner) indicated support for development of the land?	<p>Yes. A promotion agreement existed between the landowners which will be superseded by completion of the land sale by the Barron family to U and I (Pincent Lane) Ltd.</p> <p>The Barrons will benefit from eventual development under an overage clause as part of the contract of sale.</p>

Part 2: Information on site deliverability

1. Site details		
Site address	Land East of Pincent Lane Tilehurst West Berkshire	
Number of residential units proposed	Net additional units	165
	Gross (total) units	165

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No.
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See note at 4 below.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No.
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See note at 4 below.
Does the site have full planning permission?	Yes. Please provide the planning application reference	No.
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See note at 4 below.
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No – see note at 4 below.	

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3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes.
Is the site owned by a developer?	Yes. Land Securities is the UK's largest Real Estate Investment Trust (REIT).
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	<p>It is likely that that site will be sold to a housebuilder, RP, or combination of the two on grant of outline planning permission with accompanying s.106 agreement.</p> <p>TOWN is promoting the site under a Promotion Agreement with U and I (Pincent Lane) Ltd, which incentivises both parties to secure a satisfactory outline planning permission as quickly as possible with U and I (Pincent Lane) funding the preparation of the outline planning application and TOWN funding its own internal costs.</p> <p>Upon grant of a satisfactory OPA the site will be sold – in all likelihood a contract will be negotiated in advance, subject to planning.</p>
Is the site currently for sale or being marketed by a land agent?	No - other than the impending acquisition of the land owned by the Barron family to U and I (Pincent Lane) Ltd.
Is there current interest from a developer?	<p>As promoters of this site, we were approached by housebuilders and their representatives enquiring as to availability of the site in the context of the earlier planning application. An unsolicited offer for the site was also received from a developer earlier this year.</p> <p>Once allocated we have no doubt based on our knowledge of the market that there will be developer interest.</p>
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No.

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
A full note of planning history of the site is attached as Appendix Two.

Since the refusal of the 2019 outline planning application in 2022, contrary to officer recommendation of approval, the landowners resolved to continue to promote the site through the process of the WB Local Plan Review. To support this, a fresh high-level masterplanning exercise has been undertaken by Node, which is attached as Appendix Three.

The Node study confirms that the proposed 165 units can be accommodated on the site in a manner which:

- Conforms with the established landscape principles for the site as agreed with the Council's landscape adviser who considered that the 2019 application, as amended, complied with the development plan policies on landscape character including those on the setting of the AONB;
- Complies with the parameters on building heights and densities from the 2019 outline planning application, as amended, which officers considered acceptable;
- Will provide a significant amount of open space including a large new public parkland. The Node study proposes residential development on just 25% of the site – 4.77ha out of 17.52ha total site area;
- Can be achieved in a manner which respects the requirements of the sequential test of flood risk of all types; and
- Includes opportunities for self and custom build.

Were the LPR to be adopted in March 2025, with TIL13 allocated, it is envisaged that the following timelines would be achievable & realistic given the site history including the earlier application:

- Q4 2024 – Q1 2025 – preapp and stakeholder engagement process to confirm inclusion of specialist housing (older people's, custom & self build etc)
- End Q1 2025: Adoption of LPR
- Q1 2025 – Q2 2025 – preparation of OPA;
- Q2 2025: Submission of OPA;
- Q2 2025 – Q4 2025: marketing of site subject to planning permission;
- Q1 2026 – Grant of OPP + s.106 agreement;
- Q2 2026 – Sale of site to housebuilder/RP;
- Q3 2026 – Submission of RMA + discharge of conditions;
- Q1 2027 – Grant of RMP + details pursuant;
- Q2 2027 – Commencement of development.

Anticipated completions on this basis are shown in section 5 below.

:

5. Anticipated annual build out rates

Up to 2041	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	35 units, mixed tenures
	2028/29	65 units, mixed tenures
	2029/30	65 units (largely market including final self & custom build completions)
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
	2039/40	
	2040/41	

Beyond 2041**6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? If so, could these impact on the anticipated annual build out rates as set out in Q5 above? Please give details**

None. The site is considered immediately deliverable at the point of adoption of the plan and is likely to be wholly in the hands of a single developer-owner, the UK's largest Real Estate Investment Trust, by the end of August 2024.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

None

8. Are you actively considering alternative types of development for the site? Please give details

The 2019 OPA proposed inclusion of a healthcare hub facility to be made available in the first instance to the local Primary Care commissioning group. However, it was indicated that the facility was not desired by local NHS providers.

It is likely, therefore, that the proposed development would be solely for residential development for 165 dwellings (C3). A pre-app would be used to explore the Council's desire for inclusion of specialist housing, such as for older people (within class C3) and custom & self build homes.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

The site has been proposed for allocation through the LPR process and in the Examination Hearing Sessions. We believe that TIL13 would provide a significant opportunity for the provision of market and affordable housing in a part of West Berkshire where few unconstrained sites exist. It is not impacted by a need for significant new infrastructure, or diversions to existing services and the acceptability in planning terms for residential development is not only recognised by the Council in its HELAA assessment (as noted in EXAM26) but in the officer recommendation of approval for OPA 19/00113/OUTMAJ.

The Council's Highways Officer confirmed his belief to the LPR Examination Hearing that development of the site would not result in severe impact on the highway network or unacceptable impact on highway safety.

Since the 2019 application was submitted, the statutory requirement to achieve 10% Biodiversity Net Gain has been introduced. In the submitted Heads of Terms for a s106 agreement for that application, as confirmed prior to consideration by the Eastern Area Planning Committee, we committed to achieve 10% BNG. The Council's Ecologist and the BBOWT supported these proposals and although the national metric has since changed a number of times we are confident that a minimum of 10% BNG can be achieved from the proposal.

From our market contact and the advice of appointed agents (Savills), there is a ready market for the size and nature of the site in this part of West Berkshire and we are confident that it would be readily sold and developed in accordance with the OPA that we will bring forward.

10. Additional comments

The allocation of site TIL13 by the Council in response to the Inspector's report IN30 would be consistent with the evidence base and site history and strongly supported by the landowners and promoter; we feel that in addition to the other sites noted in EXAM26 allocation would demonstrate a significant step to confirming both a five year Housing Land Supply and soundness of the Plan.

Completed by: Mike Bodkin

Position:



Organisation: TOWN

Date: 9th August 2024

Appendix 5 – Council Response to Action Point 30

SP12 Housing requirement and supply

AP32. Council to propose a modification to the reasoned justification to policy SP12 to:

- a) Reflect the response to AP4 and the modified requirement of 515 dwellings per year which does not include any unmet need from Reading.
- b) Clarify that Table 2 refers to the period 1 April 2023 to 31 March 2041.
- c) Refer to “approximately” 80 dwellings to be allocated in the Hungerford and Lambourn neighbourhood plans and to those plans being “made” (rather than “adopted”).
- d) Refer to the five year housing land supply as at 1 April 2023 based on the modified trajectory to be included in the Plan ie a supply of 3,056 compared to a requirement for 2,074 including a 5% buffer (rather than referring to the housing land supply report February 2024)¹.

¹ This is without prejudice to my further consideration of the five year supply at 2023 and at 2026 and modifications that I ultimately decide are necessary relating to that and revised NPPF paragraphs 69 and 77.

Council response

EXAM23 and EXAM26 proposed Main Modifications to policy SP12 and its supporting text. Several of these are now superseded by the following Main Modifications.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 6 Delivering Housing				
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p>‘6.5 Reading Borough Council has The Reading Borough Local Plan (adopted 2019) identified a shortfall of 230 dwellings that is was anticipated to arise in the latter part of their Local Plan the plan period. The Reading Local Plan considers the period through to 2036.</p> <p>6.6 The local authorities which make up the Western Berkshire HMA have agreed a Statement of Common Ground for the purposes of local plan-making. This continues to recognises Reading’s unmet need set out in the <u>adopted Reading Borough Local Plan</u> and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading’s need as calculated by the SHMA, not by any alternative calculations of need.</p> <p>6.7 Reading has identified that a five</p>	In response to the Inspector’s Action Point AP32 (a) which is contained within IN26 .

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
			<p>yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire Housing Market Area (HMA) is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises. The Council will continue to work with the other authorities in the HMA to address this issue once Reading Borough Council has a more complete picture of its LHN as calculated by the standard methodology.</p> <p><u>Reading Borough Council now expects to deliver enough homes over the remainder of its adopted Local Plan period (to 2036) to more than meet its own adopted housing requirement including its previously identified unmet need. Reading Borough Council therefore does not expect the West Berkshire LPR to make specific provision for the unmet need as outlined in the adopted Reading Borough Local Plan.</u></p> <p>6.8 No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA.</p> <p><u>Policy SP12 expresses the housing requirement as a minimum of 515 dwellings per annum.'</u></p>	
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p><u>'Housing supply at March 2022 1 April 2023 to 31 March 2024</u></p> <p>Table 2 shows the <u>supply position at 31-March 2022 over the plan period</u>. 31-March 2022 is the date when the annual monitoring of development progress takes place. As aforementioned, for the purposes of calculating the housing</p>	In response to the Inspector's Action Point AP32 (b) which is contained within IN26 .

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
			<p>supply, if a site has planning permission, then the number of dwellings permitted, or already built, has been taken into account in the table.</p> <p>Table 2 Housing Supply at 31 March 2022 <u>1 April 2023 to 31 March 2041</u></p>	
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p>‘Meeting the housing requirement</p> <p>Several sources will ensure a continuous supply of land for housing across the plan period. These include:</p> <p>.....</p> <ul style="list-style-type: none"> Sites allocated within the Local Plan and <u>made</u> neighbourhood plans.’ 	In response to the Inspector’s Action Point AP32 (c) which is contained within IN26 .
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p>‘Retained Local Plan and Stratfield Mortimer NDP allocations</p> <p>6.12 The plan period of the LPR (2022—2039 <u>2023 - 2041</u>) overlaps with the previous plan period (2006 – 2026) and account therefore needs to be taken of sites that have already been allocated in the <u>adopted</u> Core Strategy, the <u>adopted</u> HSA DPD and the <u>adopted</u> <u>made</u> Stratfield Mortimer NDP.</p>	In response to the Inspector’s Action Point AP32 (c) which is contained within IN26 .
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p><i>Sites to be allocated in Neighbourhood Plans:</i></p> <p>6.23 A number of neighbourhood plans are in preparation <u>within the District</u>. Whilst it it is not compulsory for <u>neighbourhood plans to include allocations, and two of which will allocate further sites for housing development.</u> it is proposed that <u>approximately</u> a further 80 dwellings will be allocated by local communities through <u>their NDPs the neighbourhood plans for Hungerford and Lambourn</u>. The figures for individual neighbourhood areas are set out in Policies SP13 – 15. <u>The delivery of these neighbourhood</u></p>	In response to the Inspector’s Action Point AP32 (c) which is contained within IN26 .

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification						
			<u>plans will be monitored by the Council to ensure the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall if the Hungerford and Lambourn neighbourhood plans are not adopted made within two years of the adoption of the LPR. '</u>							
	51	Supporting text to policy SP12	<p><i>Amend the text as follows:</i></p> <p>‘Five Year Housing Land Supply</p> <p>6.25 In order to comply with the NPPF, the submitted plan must be able to demonstrate that the housing trajectory includes a sufficient supply of deliverable sites for the first five years to meet the housing requirement plus the appropriate buffer to ensure a flexible and robust supply. The assessment must then be reviewed on an annual basis.</p> <p>6.26 The latest assessment of the five-year supply <u>for the period beginning 1st April 2023 is set out in the housing trajectory in Appendix 8, and demonstrates a supply of 5.7 years. The calculation is outlined in the table below.</u>was published in November 2022-February 2024 and demonstrates a supply of 6.4 5.7 years for the five year period beginning 1 April 2022 2023. This supply forms the early part of the supply set out in the housing trajectory.</p> <p><u>Table 3: 5 year housing land supply at 1 April 2023</u></p> <table><tr><td><u>Requirement including a 5% buffer (A)</u></td><td><u>2,704</u> <u>(515 * 5 * 1.05)</u></td></tr><tr><td><u>Total deliverable housing land supply (B)</u></td><td><u>3,056</u></td></tr><tr><td><u>Total deliverable housing supply in years (B / A * 5)</u></td><td><u>5.7 years</u></td></tr></table>	<u>Requirement including a 5% buffer (A)</u>	<u>2,704</u> <u>(515 * 5 * 1.05)</u>	<u>Total deliverable housing land supply (B)</u>	<u>3,056</u>	<u>Total deliverable housing supply in years (B / A * 5)</u>	<u>5.7 years</u>	In response to the Inspector’s Action Point AP32 (d) which is contained within IN26 .
<u>Requirement including a 5% buffer (A)</u>	<u>2,704</u> <u>(515 * 5 * 1.05)</u>									
<u>Total deliverable housing land supply (B)</u>	<u>3,056</u>									
<u>Total deliverable housing supply in years (B / A * 5)</u>	<u>5.7 years</u>									

The Council acknowledges that over the course of the Examination it has proposed a number of Main Modifications to policy SP12 and its supporting text and so for ease of reading sets out a tracked changes version of the policy and its supporting text below:

Policy SP12

Approach to housing delivery

Provision will be made for at least 9,270 ~~8,721 to 9,146~~ net additional homes in West Berkshire for the period 1 April 2022 2023 to 31 March ~~2039~~ 2041; a minimum of 513 to 538 ~~515~~ dwellings per annum. ~~The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.~~

New homes will be located in accordance with Policy SP1: Spatial Strategy, Policy SP3: Settlement hierarchy and Policy DM1: Development in the Countryside.

There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community for a change of use. Developments should utilise opportunities to make better use of the existing housing stock.

To meet the housing requirement, the following sources will ensure a continuous supply of land for housing across the Plan period:

- sites allocated within the Local Plan and made neighbourhood plans;
- existing planning commitments on unallocated sites;
- existing planning commitments for C2 Use Class communal accommodation; and
- a windfall allowance.

Sites to be allocated in Neighbourhood Plans

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.

For those plans currently in preparation, it will be necessary to identify sites to meet the following levels of development:

- Hungerford: approximately 55 dwellings
- Lambourn: approximately 25 dwellings

Sites allocated within this LPR cannot be counted towards the housing requirement supplied to qualifying bodies.

Supporting text

Housing need and the housing requirement

6.1 The NPPF states that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach.... Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”*.

6.2 Details of the standard method for calculating the local housing need figure (LHN) are set out in the Housing and Economic Needs Assessment section of the Planning Practice Guidance (PPG). Using the 2014-based household projections, and an uplift based on the ratio of house prices to workplace-based earnings published by the Office for National Statistics on 22 March 2023, the LHN for the District is ~~543~~ 515 dwellings per annum using a baseline of ~~2022~~ 2023.

6.3 The LHN is not necessarily the same as the housing requirement, and the PPG outlines circumstances where it may be appropriate to plan for a higher number. These include, but are not limited to, situations where increases in housing need are likely to exceed past trends. This can include unmet needs from adjoining authorities, strategic infrastructure requirements that are likely to drive an increase in the local housing needs, and growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate extra growth.

6.4 Although the NPPF no longer refers to ‘Housing Market Areas’ (HMAs), the PPG provides a definition of a housing market area which refers to the importance of key functional linkages between places where people live and work. The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA, February 2016) found that West Berkshire has a strong functional relationship with Wokingham Borough, Reading Borough and Bracknell Forest. As a result, there has been much collaborative working between these authorities on housing matters and associated infrastructure.

6.5 ~~Reading Borough Council has~~ The Reading Borough Local Plan (adopted 2019) identified a shortfall of 230 dwellings that ~~is was~~ anticipated to arise in the latter part of ~~their Local Plan~~ the plan period. ~~The Reading Local Plan considers the period through to 2036.~~ 6.6 The local authorities which make up the Western Berkshire HMA ~~have~~ agreed a Statement of Common Ground for the purposes of local plan-making. This ~~continues to~~ recognises Reading’s unmet need set out in the adopted Reading Borough Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading’s need as calculated by the SHMA, not by any alternative calculations of need.

6.7 Reading has identified that a five yearly review is required by 2024 and that will ~~need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire Housing Market Area (HMA) is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises.~~ The Council will continue to work with the

~~other authorities in the HMA to address this issue once Reading Borough Council has a more complete picture of its LHN as calculated by the standard methodology.~~

Reading Borough Council now expects to deliver enough homes over the remainder of its adopted Local Plan period (to 2036) to more than meet its own adopted housing requirement including its previously identified unmet need. Reading Borough Council therefore does not expect the West Berkshire LPR to make specific provision for the unmet need as outlined in the adopted Reading Borough Local Plan.

6.8 No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA.

Policy SP12 expresses the housing requirement as a minimum of 515 dwellings per annum.

~~6.9 In order to support the government's objective of significantly boosting the supply of homes, which is set out in the NPPF, Policy SP12 expresses the housing requirement as a range, with a minimum requirement of 513 dwellings per annum meeting the 2022 LHN. The upper end of the range allows for approximately 5% additional homes (rounded to 538) on top of the 2022 LHN.~~

~~6.10 The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable.~~

Meeting the housing requirement

6.14 Several sources will ensure a continuous supply of land for housing across the plan period. These include:

- ~~retained allocations in the Local Plan and Stratfield Mortimer Neighbourhood Development Plan (NDP);~~
- ~~allocations in the Local Plan which are not being retained in the LPR due to development being under construction;~~
- sites allocated within the Local Plan and made neighbourhood plans;
- existing planning commitments on unallocated sites;
- existing planning commitments for communal accommodation; and
- a windfall allowance.
- ~~windfall sites: sites not specifically identified in the development plan but that will come forward through the development management process in accordance with policies set out in the Local Plan and through the use of permitted development rights; new sites allocated in the LPR; and~~
- ~~new sites to be allocated in neighbourhood plans.~~

Retained Local Plan and Stratfield Mortimer NDP allocations:

6.12 The plan period of the LPR (2022—2039 2023 - 2041) overlaps with the previous plan period (2006 – 2026) and account therefore needs to be taken of sites that have already been allocated in the adopted Core Strategy, the adopted HSA DPD and the adopted made Stratfield Mortimer NDP. The relevant policy criteria for the retained

allocations included in Chapter 8 still apply to these sites to cover events such as revised schemes being submitted or a planning permission lapsing. ~~However for the purposes of calculating the housing supply, if a site has planning permission, then the number of dwellings permitted has been taken into account.~~

This element of the supply consists of allocations with and without planning permission at 31 March 2023. Where a site has an extant permission, the number of dwellings permitted has been used for the purposes of calculating the housing supply. For those sites without permission at 31 March 2023, the number allocated within the policy has been used.

~~6.13 2,652 units were outstanding at 31 March 2022.~~

~~6.14 Allocated sites that are retained are listed in Policies SP13–15.~~

Allocations in the Local Plan which are not being retained:

6.15 Several sites that are allocated within the Core Strategy and HSA DPD are not being retained in the LPR and this is because development is at an advanced stage of construction. At 31 March ~~2022~~ 2023, there were ~~724~~ 451 units outstanding on these sites.

New sites allocated in the LPR: (moved up from below and amended as follows:)

6.22 The Council's overall approach to identifying land for allocation is set out in Policy SP1 and in Policy SP3. Assessment of the availability, suitability and viability of individual sites has taken place through the [Housing and Economic Land Availability Assessment](#) (HELAA) and further technical and sustainability assessments have been undertaken. Sites proposed for allocation are detailed in ~~Ppolicies SP13–15~~ SP16 and SP17, as well as policies RSA1 to RSA23, and ~~these include provide~~ additional housing supply on newly allocated sites of some 1,720 homes. This includes the strategic allocation at North East Thatcham for approximately 1,500 homes within the plan period.

Sites to be allocated in Neighbourhood Plans:

The NPPF requires that within the housing requirement for the whole District, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

Should any qualifying body decide to prepare a neighbourhood plan that includes residential allocations or update an adopted a made neighbourhood plan to include residential allocations, then the Council will supply a housing requirement figure. ~~The policy makes clear that allocations made through neighbourhood plans will be in addition to the homes being allocated within the LPR and the other sources of supply identified in the policy.~~

In meeting this requirement, the policy clarifies that sites allocated within this LPR cannot be counted towards meeting the figure supplied to a qualifying body. In addition, policy SP3 also makes clear that any NDP allocations within defined settlement boundaries will not count towards meeting the housing requirement figure in policy

SP12 either. This is because there is a presumption in favour of development within defined settlement boundaries and to do so would be inconsistent with the assumptions made in the LPR about the District's overall housing land supply.

~~Any potential sites within defined settlement boundaries will not qualify towards the targets outlined in the policy. This is because there is a presumption in favour of development within settlement boundaries.~~

6.23 A number of neighbourhood plans are in preparation within the District. Whilst it is not compulsory for neighbourhood plans to include allocations, and two of which will allocate further sites for housing development, it is proposed that approximately a further 80 dwellings will be allocated by local communities through their NDPs the neighbourhood plans for Hungerford and Lambourn. The figures for individual neighbourhood areas are set out in Policies SP13 – 15. The delivery of these neighbourhood plans will be monitored by the Council to ensure the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall if the Hungerford and Lambourn neighbourhood plans are not adopted made within two years of the adoption of the LPR.

Existing planning commitments on unallocated sites:

6.46 Existing permissions for housing on ~~unnon~~-allocated sites will also contribute to supply. Over ~~1,958~~ 1,729 units on windfall sites, those not specifically identified in the development plan, already had permission or prior approval for permitted development at 31 March 2022 2023. 31 March 2023 is the date when the annual monitoring of development progress takes place.

Existing planning commitments for communal accommodation (Use Class C2):

6.47 The housing supply and delivery section of the PPG requires local planning authorities "to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market." The Housing Delivery Test Measurement Rulebook gives the ratio for communal accommodation based on the national average number of adults in all households as 1.8 based on the 2011 Census. For example, a 90 bed care home would equate to 50 net dwellings ($90 \div 1.8 = 50$).

6.48 At 31 March 2022 2023, ~~T~~there are existing permissions for residential institutions in Use Class C2 which equate to ~~57~~ 91 units.

Windfall allowance

6.49 The NPPF states that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes (Para.68). Policies within the LPR identify the most sustainable settlements and direct development to the built up areas within settlement boundaries. The Council also publishes and maintains a [register of brownfield sites](#) that are available and potentially suitable for residential development across the District.

6.20 The Council has assessed the contribution likely to be made from windfall sites based on past trends. It is clear that windfall sites have consistently played an

important role in the housing supply of the District: approximately ~~74%~~ 72% of completions in the period 2006 - ~~2022~~ 2023 were on unallocated, windfall sites. The windfall allowance, of 140 dwellings per annum is, in comparison, relatively modest and will add flexibility to the supply over the plan period. It has been based on the average annual delivery on small sites of less than 10 units over the existing plan period 2006 – ~~2022~~ 2023. The calculated allowance set out in Table 2 takes account of existing small permissions that are already included in the supply by deducting these from the allowance of 140 dpa over the period ~~2022~~ 2023 to 2039 2041. Any future windfall sites of 10 units or more are not included in the calculations, which introduces flexibility to the of future supply, ~~which introduces flexibility and means that any allocations of medium or large sites within settlement boundaries will not result in any double-counting.~~

Housing supply at ~~March 2022~~ 1 April 2023 to 31 March 2041

Table 2 shows the supply position at ~~31 March 2022~~ over the plan period. ~~31 March 2022 is the date when the annual monitoring of development progress takes place. As aforementioned, for the purposes of calculating the housing supply, if a site has planning permission, then the number of dwellings permitted, or already built, has been taken into account in the table.~~

Table 2 Housing Supply at ~~31 March 2022~~ 1 April 2023 to 31 March 2041

Supply category	Net Units Outstanding No. of net dwellings
<u>Sites allocated within the Local Plan and neighbourhood plans</u>	
<i><u>Retained Local Plan and Stratfield Mortimer NDP allocations</u></i>	
• Core Strategy: Sandleford Park Strategic Site	1,580
• <u>Housing Site Allocations</u> DPD Sites	990
○ <u>Sites with extant permissions</u>	<u>887</u>
○ <u>Sites without extant planning permissions</u>	<u>111</u>
• Stratfield Mortimer NDP Site	82 <u>58</u>
<i>Local Plan allocations not being retained (due to site being at an advanced stage of construction)</i>	
• Core Strategy: Newbury Racecourse	465 <u>398</u>
• <u>Housing Site Allocations</u> DPD Sites	256 <u>53</u>
<i><u>New allocations within the LPR</u></i>	<u>1,720</u>
<i><u>Sites to be allocated in Neighbourhood Development Plans</u></i>	

• <u>Hungerford</u>	<u>55</u>
• <u>Lambourn</u>	<u>25</u>
<i>Subtotal of sites allocated within Local Plan and neighbourhood plans</i>	<u>4,887</u>
Existing planning commitments on unallocated sites	<u>1,958 1,729</u>
Existing planning commitments for C2 Use Class communal accommodation	<u>57 91</u>
Windfall allowance to 2039 <u>2041</u>	<u>1,949 2,166</u>
TOTAL HOUSING SUPPLY	<u>7,337 8,873</u>

Future Supply

~~6.21 In order to meet the target of 538 new dwellings per annum over the plan period, sites for a further 1,809 dwellings need to be found (requirement of 9,146 minus supply of 7,337). There also needs to be some built in flexibility to allow for phasing issues and for an element of non-delivery. The expression of the requirement as a range and the use of a relatively modest windfall allowance both add to the flexibility required to ensure that targets can be met.~~

~~New sites allocated in the LPR~~

~~6.22 The Council's overall approach to identifying land for allocation is set out in Policy SP1 and in Policy SP3. Assessment of the availability, suitability and viability of individual sites has taken place through the Housing and Economic Land Availability Assessment (HELAA) and further technical and sustainability assessments have been undertaken. Sites proposed for allocation are detailed in Policies SP13 – 15 and provide additional housing supply on newly allocated sites of some 1,720 homes. This includes the strategic allocation at North East Thatcham for approximately 1,500 homes within the plan period.~~

~~Sites to be allocated in Neighbourhood Plans~~

~~6.23 A number of neighbourhood plans are in preparation which will allocate further sites for housing development. It is proposed that a further 80 dwellings will be allocated by local communities through their NDPs. The figures for individual neighbourhood areas are set out in Policies SP13 – 15.~~

Housing Trajectory

6.24 The NPPF requires local planning authorities to illustrate the expected rate of housing delivery over the plan period through a housing trajectory. In preparing the trajectory the Council engages with landowners and developers and gives consideration to likely lead in times, start dates and build rates on different types of site. The housing trajectory showing the projected timeline for the delivery of housing developments across the plan period in relation to the annual average requirement is

included in Appendix 8. The trajectory will be updated annually and reported in the Annual Authority Monitoring Report (AMR).

Five Year Housing Land Supply

6.25 In order to comply with the NPPF, the submitted plan must be able to demonstrate that the housing trajectory includes a sufficient supply of deliverable sites for the first five years to meet the housing requirement plus the appropriate buffer to ensure a flexible and robust supply. The assessment must then be reviewed on an annual basis.

6.26 The latest assessment of the five-year supply for the period beginning 1st April 2023 is set out in the housing trajectory in Appendix 8, and demonstrates a supply of 5.7 years. The calculation is outlined in the table below. ~~was published in November 2022 February 2024 and demonstrates a supply of 6.4 5.7 years for the five year period beginning 1 April 2022 2023. This supply forms the early part of the supply set out in the housing trajectory.~~

Table 3: 5 year housing land supply at 1 April 2023

<u>Requirement including a 5% buffer (A)</u>	<u>2,704</u> <u>(515 * 5 * 1.05)</u>
<u>Total deliverable housing land supply (B)</u>	<u>3,056</u>
<u>Total deliverable housing supply in years (B / A * 5)</u>	<u>5.7 years</u>

6.27 The ability to demonstrate a five year land supply of land for housing is important in the decision making process. If the supply falls below the required amount, the presumption in favour of sustainable development applies and the plan-led approach advocated in the NPPF is compromised. The allocation of additional sites in this LPR aims to ensure that a five year supply can continue to be demonstrated when the position is reviewed each year and is maintained throughout the plan period.

SP18 Housing type and mix

AP33. Council to propose a modification to policy SP18 to clarify the requirement for meeting the wheelchair accessible standard M4(3) in relation to the provision of affordable housing.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 6 Delivering Housing				
	67	Policy SP18	<p><i>Amend fourth paragraph of Policy SP18 as follows:</i></p> <p>'All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings. unless evidence clearly demonstrates that this would make the scheme unviable. The Council will also support proposals for affordable wheelchair adaptable and accessible homes where evidenced by need. Wheelchair user dwellings will be negotiated on a site by site basis. The Council will take account of site-specific factors, evidence of site suitability and/or whether it would render development unviable in determining whether these requirements should apply.'</p>	In response to the Inspector's Action Point (AP33) contained with <u>IN14</u>

SP19 Affordable housing

AP34. Council to propose a modification to policy SP19 to:

- a) Amend the requirement for affordable housing provision on sites of between five and nine dwellings so that it applies only to designated rural areas (and those areas should be defined in the reasoned justification and/or on a map).
- b) Clarify that a review mechanism will not always be applicable if a lower provision of affordable housing is agreed.
- c) Refer to the objective of creating mixed and balanced communities if financial contributions are, exceptionally, to be accepted as an alternative to on-site provision of affordable housing.
- d) Clarification of the three references to First Homes.

Council response

a)

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 6 Delivering Housing				
	70	Policy SP19	<p><i>Amend second paragraph of the policy as follows:</i></p> <p>'b. <u>In areas designated as rural under Section 157(1) of the Housing Act 1985</u> On development sites of between five and nine dwelling, 20% provision.'</p>	To comply with national policy and in response to the Inspector's Action Point (AP34a) contained within <u>IN26</u>

b)

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 6 Delivering Housing				
	70	Policy SP19	<p><i>Amend fourth paragraph of the policy as follows:</i></p> <p>'If a lower provision of affordable housing is sought in exceptional circumstances, a review mechanism will <u>may</u> be required to ensure that if viability improves during the lifetime of the development project, additional affordable housing, up to the levels specified in this policy, is provided.'</p> <p><i>Modify paragraph 6.75 to supersede that in paras 6.75 and 6.78 in the Council's Schedule of Proposed Main Modifications [EXAM 23] as follows:</i></p> <p>'6.75 The NPPF and the Planning Practice</p>	To comply with national policy and in response to the Inspector's Action Point (AP34b) contained within <u>IN26</u>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
			<p>Guidance (PPG) states that affordable housing should only be sought from major development of 10 or more dwellings or on housing sites of 0.5 ha or more across the district, <u>other than in designated rural areas</u>. In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty. As Approximately about 74% of West Berkshire is within an AONB. and Most of the remaining parishes are designated rural areas. It is considered justified and reasonable for the Council to secure 20% affordable housing on sites of 5 or more <u>between five and nine dwellings in the parishes designated as rural and this is reflected in Policy SP19</u>. In the following parishes that are not designated as rural areas the level of affordable housing required will only apply to sites of 10 dwellings or more as set out in the Policy.</p> <ul style="list-style-type: none"> • Burghfield • Greenham • Holybrook • Newbury • Speen • Thatcham • Theale • Tilehurst' 	

c)

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 6 Delivering Housing				
	70	Policy SP19	<p><i>Amend fifth paragraph of the policy as follows:</i></p> <p>'In exceptional circumstances where site specific issues inhibit the provision of on-site affordable housing, or where provision can be better met on an alternative site in the district, off-site contributions may be accepted as an alternative, <u>where it would result in mixed and balanced communities.</u>'</p>	In response to the Inspector's Action Point (AP34c) contained within <u>IN26</u>

d) Clarifications to the references made in the Policy to First Homes are set out in paragraphs 6.87 – 6.89 of the supporting text to the Policy SP19.

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
			plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;'	any necessary infrastructure upgrades are delivered ahead of occupation. To avoid duplication with policy DM7, the reference to such a strategy is proposed to be removed.
	130	Policy RSA22	<i>Delete the criterion as follows:</i> 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the Chieveley Sewage Treatment Works;'	In response to the Inspector's Action Point AP40 contained within IN26 . EXAM23 proposes modifications to policy DM7 to ensure that phasing conditions are applied where there is a capacity constraint to ensure
	138 140 142 144 146 148	Policy ESA1 Policy ESA2 Policy ESA3 Policy ESA4 Policy ESA5 Policy ESA6	<i>Delete previously proposed modification as follows:</i> 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply, both on and off site. Development will be occupied in line with this strategy.'	any necessary infrastructure upgrades are delivered ahead of occupation. To avoid duplication with policy DM7, this criterion is no longer required.

In response to Action Point AP40 (c), it is proposed to retain the Main Modification included within [EXAM23](#) which identifies that phasing conditions may be required to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. This Main Modification is also included within the Statement of Common Ground signed with Thames Water.

The proposed Main Modification reads as follows:

Development which would overload available facilities and create or exacerbate problems of flooding or pollution will not be permitted. Where upgrades to water supply and waste water are required and where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the

~~occupation of the relevant phase of development. consideration should be given to phasing the development so that the necessary infrastructure is in place. The identified need for the development or expansion of other water supply or wastewater facilities, required for existing or proposed development, is an important material consideration in the consideration of planning applications for such proposals.~~

[PPG](#) (Paragraph: 016 Reference ID: 34-016-20140306) identifies that early engagement with the local planning authority, the Environment Agency, and relevant water and sewerage companies as appropriate can help establish whether particular water and wastewater issues need to be considered.

The Water Cycle Study ([WAT1c](#)) identifies that some upgrades are necessary to waste water treatment works in the district, so phasing of development may be necessary.

Thames Water's response to the Regulation 19 pre-submission consultation (ref: [958613](#)) highlights the importance of considering the net increase in water and waste water demand to serve development. It also highlights that it will not be possible to identify over the plan period all of the water and sewerage infrastructure required due to the way water companies are regulated and plan in five-year periods.

Thames Water recommend in their response that developers engage with them at the earliest opportunity so that they can establish demand and network infrastructure. They go on to identify that they will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.

It is considered that the proposed Main Modification will ensure that the policy aligns with the PPG. It puts a marker down that supply networks need to be considered, and planning conditions may be needed to phase development so that upgrades are completed prior to occupation.

DM15 Trees, woodlands and hedgerows

AP41. Council to propose a modification to delete the third paragraph of policy DM15 or amend it to clarify the requirement relating to “protected trees, groups of trees, woodland or important hedgerows” and ensure consistency with national policy and guidance⁶. This should include consideration of whether the reference to “exceptional circumstances” is justified; whether “protected” applies to “groups of trees” and “woodlands” (as well as “trees”); what is meant by “important hedgerows”; and what is meant by “good practice recommendations”.

⁶ Including PPG ID:36-089 to 091.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 10 Development Management Policies: Our Environment & Surroundings				
	182	Policy DM15 and paragraph 10.132	<p><i>Amend third paragraph of the policy as follows:</i></p> <p>‘The loss or deterioration of protected trees, groups of trees, woodland or important hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations.</p> <p>Development affecting trees protected by a Tree Preservation Order (TPO) must be justified and the impact of the proposal will be assessed on the amenity of the area. Where <u>these and other</u> protected trees are subject to felling, a replacement of an appropriate number, and size in an appropriate location will be required.’</p> <p><i>Amend supporting text as follows:</i></p> <p>‘10.132 Protected trees includes trees protected by a Tree Preservation Order <u>(whether that be an individual tree, a group of individual trees or a woodland)</u> or those located within a Conservation Area. They also include those hedgerows meeting the criteria of “important hedgerow” in the Hedgerow Regulations 1997 (as amended).’</p>	To comply with national policy and in response to the Inspector’s Action Point (AP41) contained within <u>IN26</u>

DM30 Residential space standards

AP42. Council to provide the evidence on the size and type of dwellings currently being built in the area as referred to in paragraph 11.105 to demonstrate that the nationally described space standards are needed in West Berkshire.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 11 Development Management Policies: Delivering Housing				
	207	Policy DM30	<p><i>Remove policy DM30 and its supporting text from the LPR</i></p> <p><i>Consequential amendments to remove references to policy DM30 in policies DM30 and SP7</i></p>	<p>In response to the Inspector's Action Point (AP42) contained within <u>IN26</u>.</p> <p>A more detailed evidence base study is required. This will be undertaken as part of the next review of the Local Plan.</p>

DM31 Residential amenity

AP43. Council to propose a modification to policy DM31 and reasoned justification to clarify the requirements relating to private amenity space (including balconies) and communal open space in flatted developments.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 11 Development Management Policies: Delivering Housing				
	208	Policy DM31 and paragraphs 11.112 and 11.113	<p><i>Amend criterion i in the policy as follows:</i></p> <p>‘i. Functional private amenity space of a quality and size to meet the needs of the occupants;’</p> <p><i>Amend the supporting text as follows:</i></p> <p>‘11.112 <u>For flats, there may be a variety of approaches to providing outdoor amenity space for flats which will vary according to the location and character of the proposed development.</u> As a guide, for 1 or 2 bedroom flats at least 25 square metres of communal open space should be provided per unit. For three or more bedroom flats at least 40 square metres of communal open space should be provided per unit. <u>Additionally, balconies could compensate for limited garden space if they provide high quality space, and the space offered would be taken into consideration when looking at the overall amenity space proposed for a flatted development.</u></p> <p>11.113 Balconies may not be counted towards the provision of amenity space for houses or flats, unless in exceptional circumstances, where they provide high quality space.’</p>	<p>In response to the Inspector’s Action Point (AP43) contained within <u>IN26</u>, Balconies do provide private amenity space, and some can be taken into consideration when reviewing a scheme for flatted developments. If it were the case that each flat provided a balcony that provided a good quality space there may not necessarily be a requirement for communal space as well.</p>

Policy DM41 Digital infrastructure

AP44. Council to propose a modification to delete policy DM41 in its entirety⁷ or clarify the second paragraph, part d, and the final paragraph so that it is evident how a decision maker should react to development proposals.

⁷ Parts a, b and c are already proposed for deletion [EXAM23].

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 12 Development Management Policies: Fostering Economic Growth and Supporting Local Communities				
	230	Policy DM41	<p><i>Amend criterion d in the policy as follows:</i></p> <p>'Telecommunications Infrastructure:-</p> <p>d. All residential developments and all new employment generating development should consider the mobile telecommunications requirements of the development proposal. This is to ensure that there is sufficient coverage.'</p>	In response to the Inspector's Action Point (AP44) contained within <u>IN26</u> .

On 9 March 2020, the Government announced that it had entered into an agreement with the four mobile network operators (MNOs) – EE Limited (EE), Hutchison 3G UK Limited (Three), Telefónica UK Limited (O2) and Vodafone Limited (Vodafone) – to grant funding a Shared Rural Network (SRN). Under the terms of this agreement, each of the four MNOs has committed to provide good quality data and voice coverage to 88% of the country's landmass by 30 June 2024, and 90% by 31 January 2027.

The MNOs have agreed to their 900 MHz and/or 1800 MHz licences being varied to give effect to these commitments in the form of new coverage obligations (the '2020 coverage obligations'). Each operator has also agreed to meet certain coverage thresholds in each UK nation by 30 June 2024 and 31 January 2027, and provide a certain extent of new coverage in areas where roads and premises are located.

By 2026, the vast majority of mobile phones will be capable of 'WiFi calling', which removes the need for indoor coverage of the mobile phone signal in order for the user to have service.

Businesses increasingly have specific requirements for indoor mobile phone services and are deploying their own infrastructure (including their own non-public networks). Many will have preferred suppliers, who will use specific infrastructure vendors. Therefore, infrastructure that must be installed before completion may be redundant. In any case, the technology is advancing so rapidly that what is specified at the time of planning approval could be obsolete by the time that the building is occupied.

In light of the above, it is considered that criterion (d) of the policy is no longer required.

The remainder of the policy DM41 is considered necessary. This is because a Supplementary Planning Document is proposed to be prepared in conjunction with the Berkshire Digital Infrastructure Group to provide direction and clarity around the provision of digital infrastructure.

Policy DM42 Transport infrastructure

AP45. Council to propose a modification to delete the last two sentences of the first paragraph of policy DM42 and insert the following (or similar): “Development will, where necessary, be required to make a proportionate contribution to the provision of or improvement to transport infrastructure including, where relevant, the following:”

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 12 Development Management Policies: Fostering Economic Growth and Supporting Local Communities				
	232	Policy DM42	<p><i>Amend the final two sentences in the first paragraph of the policy as follows:</i></p> <p>‘Where required, new developed will be expected_ <u>Development will, where necessary, be required to</u> <u>make a proportionate contribution to the provision of</u> <u>or improvement of a range of to transport</u> <u>infrastructure. This transport infrastructure will</u> specifically, but not exclusively, include including, where relevant, the following:...</p>	In response to the Inspector’s Action Point (AP45) contained within <u>IN26</u>

DM44 and DM45 Parking and travel plans

AP46. Council to propose modifications to policies DM44 and DM45 to

- a) Delete references to proposals being required to “be in accordance with” or “follow” the named guidance documents and replace with “have regard to” or “take account of”.
- b) Remove the duplication between the last section of policy DM44 and policy DM45 relating to travel plans, and amend the reference to “regular monitoring”.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 12 Development Management Policies: Fostering Economic Growth and Supporting Local Communities				
	235	Policy DM44	<p><i>Amend policy as follows:</i></p> <p>Parking ‘...Cycle and motorcycle parking should be provided in accordance with <u>have regard to</u> the Council’s ‘Cycling and Motorcycling Advice and Standards for New Development’. This sets out design standards and expected levels of provision for different types of development.....</p> <p>Residential Parking for New Development The layout and design of parking spaces should follow <u>take account of</u> the parking design guidance included within the Council’s ‘Highway Design Guidance for Residential Development’ in order that good quality homes and neighbourhoods are created.’</p>	In response to the Inspector’s Action Point (AP46a) contained within <u>IN26</u>
	238	Policy DM45 and supporting text	<p><i>Amend last paragraph of policy as follows:</i></p> <p>‘Where developments are required to develop travel planning measures, it is expected that necessary targets will be set to restrict single occupancy vehicle journeys and to increase sustainable travel, and undertake regular monitoring and reporting in line with the requirements of the Local Planning Authority.’</p> <p><i>Amend supporting text to include a new paragraph after para 12.112 as follows:</i></p> <p>‘Commonly travel plans should be monitored for a period of five years, which should allow for travel patterns to become established. However, for large multi-occupancy developments which may be built over an extended period, the monitoring period may cover a period encompassing the construction and final occupation of the development and include a period of up to five years beyond final occupation. In these incidences, the monitoring period will be agreed</p>	In response to the Inspector’s Action Point (AP46b) contained within <u>IN26</u>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
			between the Council and the developer.'	

Approximate number of dwellings referred to in RSA policies

AP48. Council to propose a modification to paragraph 8.2 to replace the final three sentences with the following (or similar):

“The approximate numbers are indicative, and actual numbers will be determined during the planning application process through detailed design work in accordance with the parameters set out below and other relevant policies, having regard to the particular characteristics of the site and its surroundings”.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 8 Non-Strategic Site Allocations				
	85	Para 8.2	<p><i>Amend the final three sentences of the paragraph as follows:</i></p> <p>‘... The actual numbers achieved on any site may vary slightly depending on the detailed design work carried out in preparation for a planning application and will be influenced by the topography and other specific site characteristics. Final densities will depend on the housing type and mix. Approximate numbers are therefore given in the site policies to enable some flexibility at the more detailed design stage. The <u>approximate numbers are indicative, and actual numbers will be determined during the planning application process through detailed design work in accordance with the parameters set out below and other relevant policies, having regard to the particular characteristics of the site and its surroundings.’</u></p>	In response to the Inspector’s Action Point (AP48) contained within <u>IN26</u>

RSA14 Lynch Lane, Lambourn

AP50. Council to propose a modification to policy RSA14 to clarify the requirement in part h relating to the layout of development, Flood Zone 2 and the River Lambourn SSSI/SAC, in particular the references to 15m, 38m and 88m.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 8 Non-Strategic Site Allocations				
	113	Policy RSA14	<p><i>Amend criterion h as follows:</i></p> <p>'h. Development will need to ensure the retention of existing riverside vegetation and To ensure the provision of a significant an appropriate buffer for /stand off between the woodland and adjacent River Lambourn SSSI/SAC and any development. In light of an initial Phase 1 Habitat Survey it is considered that no development on the site will take place within 15m of the outer edge of Flood Zone 2, allowing a minimum buffer/stand off from the SSSI/SAC of 38m (max. 88m);'</p>	In response to the Inspector's Action Point (AP50) contained within <u>IN26</u>

RSA17 Chieveley Glebe, Chieveley

AP51. Council to amend the proposed modification to policy RSA17 [EXAM23] to clarify parts b and c relating to vehicular access, the provision of a footway fronting the site, and the retention and enhancement of the existing hedgerow. In so doing, it may be necessary to amend the five access points shown on the site plan.

Council response

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 8 Non-Strategic Site Allocations				
	119	Policy RSA17	<p><i>Amend text in the policy as follows:</i></p> <p>'b) Access will need to be obtained <u>provided</u> from East Lane. <u>The existing frontage hedgerow should be retained and enhanced as much as possible as part of the design and so proposals should allow for a maximum of three access points from East Lane. To achieve the sight lines of 2.4 x 43 metres, these will</u> accesses may need to serve more than one dwelling.</p> <p>c) A footway fronting the site which links to the existing footway to the west of the site. <u>Opportunities should be taken to enable linkages to connect to existing footways along East Lane;</u></p> <p><i>Amend indicative site map to show three access points</i></p>	In response to the Inspector's Action Point (AP51) contained within <u>IN26</u>

RSA22 Station Road, Hermitage

AP52. (a) Council to propose a modification to policy RSA20 and the site plan to reflect the statement of common ground published on 4 June 2024 [EXAM34]. In so doing the Council should consider further whether reference to “approximately 36 dwellings” is justified bearing in mind that public open space provision will be provided on the hatched area meaning that more than 75% of the remaining site area may be developable.

(b) Council to consider whether policies RSA20 and RSA21 need to be modified to clarify the relationship between the three allocations, including provision of and access to the public open space to be provided on the hatched area within RSA22.

Council response

(a) Regarding the site capacity of RSA22 Land adjacent Station Road, Hermitage, the Council considered that the gross site area should include the 15 metres set back from Station Road and the set back from the existing regenerated treed railway line when calculating the site capacity. A gross site area of 2.8 hectares should therefore be used to calculate the site capacity, then applied the developable area percentage (75%). A standard density for the edge of village / settlement in AONB has been used (20dph). This gives a development potential of approximately 42 dwellings. This also reflects a similar low density to the adjacent allocations RSA20 Land off Charlotte Close and RSA21 Land to the south east of the Old Farmhouse in Hermitage.

The Council remains of the view that according to the Council’s Density Pattern Book Study ([SIT3](#)), a consistent developable area percentage (gross to net ratio) should be applied to all RSA sites to determine the developable area (net area) of the site, to exclude the area that is not developable, for example, possible need for access and service infrastructure, landscape buffers and SUDS provision etc.

Sites of this size do not usually require a large public open space to be provided within the site. However, the location and extent of the public open space to be provided in RSA22 is considered necessary to achieve the set objectives in the Landscape Sensitivity and Capacity Assessment (May 2022, [LAN8bb](#)), to provide a central open area which could have a character of a village green and which could serve a wider area including RSA20 Land off Charlotte Close, and RSA21 Land to the south east of the Old Farmhouse in Hermitage. The Council’s Density Pattern Book Study ([SIT3](#)) also sets out that the net density calculation should exclude open spaces serving a wider area. Therefore, the area of public open space is excluded when calculating the site capacity.

To reflect the agreed position from the statement of common ground published on 4 June 2024 [EXAM34] and the revised site capacity, the Council proposes to make the following Main Modifications to policy RSA22, and to the site map (see Annex D).

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
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Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 8 Non-Strategic Site Allocations				
	130	Policy RSA22	<p><i>Amend text in the policy as follows:</i></p> <p>a) The provision of approximately 34 42 dwellings in a low density scheme that provides a mix of dwellings sizes and types appropriate for the local area;</p> <p>b) Access to the site will be provided by Station Road, <u>with options for other accesses from Lipscomb Close and / or B4009 Newbury Road being explored.</u></p> <p><u>If required, any access from Lipscomb Close should be a through route.</u> for <u>Walking and cycle links will be provided</u> to the allocations RSA20 (Charlotte Close) and RSA21 (Old Farmhouse). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local primary school to enable sustainable travel;</p> <p>d) ... ii) Retain the the land to <u>in</u> the north <u>western part</u> of the site as <u>a public open space</u> an open area which could have a character of a village green;</p> <p>d) ... iv) Be <u>15 metres width</u> set back from Station Road to retain the rural character and the setting of the mature roadside trees;</p>	To reflect the agreed position from the statement of common ground published on 4 June 2024 (EXAM34) and in response to the Inspectors Action Point AP52 (a) which is contained within IN26 .

(b) The Council proposes the following Main Modifications to policies RSA20 and RSA21, and to the site maps (see Annexes E & F).

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
Chapter 8 Non-Strategic Site Allocations				
	126	Policy RSA20	<p><i>Amend criterion as follows:</i></p> <p>‘b) The site will be accessed via Charlotte Close with the provision of pedestrian and cycle linkages through the site to the allocations RSA21 (Land to the south east of the Old Farmhouse) and <u>the public open space in</u> RSA22 (land adjacent Station Road). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel;’</p>	In response to the Inspectors Action Point AP52 (b) which is contained within IN26 .

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	128	Policy RSA21	<p><i>Amend criterion as follows:</i></p> <p>‘e) The site will be accessed via Newbury Road and/or Lipscombe Close with the provision of pedestrian and cycle linkages from Lipscombe Close through the site to the allocations at RSA20 (Land off Charlotte Close) and <u>the public open space in</u> RSA22 (land adjacent Station Road). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local primary school to enable sustainable travel;’</p>	In response to the Inspectors Action Point AP52 (b) which is contained within IN26 .

PAN8 North of Pangbourne Hill

AP53. Council to consider further whether its response to AP14 is justified in terms of the extent of the red line site shown on map 2 in EXAM26 Annex C and the capacity being limited to approximately 25 dwellings, having regard to the available evidence relating to landscape and access.

Council response

The Council considers its response to AP14 is justified in terms of the extent of the red line shown on map 2 in EXAM26 Annex C and the capacity being limited to approximately 25 dwellings.

The North Wessex Downs AONB Landscape Character Assessment ([LAN9](#)), notes that some of the key characteristics of the landscape character area (LCA2B) in which this site is located are ‘the elevated plateaus with incised dry valleys’ and ‘large scale open arable summits’. It then goes on to note that one of the key issues for this area is the ‘localised visual intrusion on the open summits and skylines and the potential future demand, which would impact on the secluded rural character.’ A key management requirement for this area is therefore to conserve and enhance ‘the open downland summits and views.’

Pangbourne is a discrete historic settlement located around the confluence of two rivers, the Pang and the Thames and their valleys. Development above the 70m contour is not generally part of its settlement pattern. Although a small amount of low density development to the south of Pangbourne Hill has encroached on the upper valley sides, these are older detached properties set in large mature gardens, where, as shown in photo viewpoint EDP4 (page 187 in the site promoter’s Regulation 19 representation ([862911](#))), the mature garden vegetation screens and integrates them into the partly wooded downland landscape.

Existing development at Pangbourne, as illustrated in the site promoter’s Regulation 19 representation ([862911](#)) on Plan EDP4: Topography (page 180) is located within the lower river valley/floodplain with the enclosing elevated plateau and upper valley sides generally undeveloped. This provides Pangbourne with its rural setting and wooded downland context. In contrast, the western part of PAN8 is shown to be on the elevated plateau and upper valley sides.

Land above the 70m contour is clearly visible within the surrounding area. The recent development at Sheffield Close illustrates how visible development above the 70m contour can be. Photo viewpoint EDP4 (page 187 in the site promoter’s Regulation 19 representation ([862911](#))) was taken from the western edge of Purley-on-Thames looking towards PAN8. Development is visible on the upper valley slopes above 70m with development at Sheffield Close clearly visible and the adjacent open summit (above contour 70m which forms part of PAN8) also clearly visible. Similarly, Photo 5 (page 25) in the Landscape Sensitivity and Capacity Assessment undertaken for the site in November 2020 ([LAN6a](#)) shows development at Sheffield Close (located on the 75m contour) protruding onto the elevated plateau.

The Council does not consider that the woodland planting proposed as a mitigation measure will reduce the adverse visual effect, as the proposed development will be seen against the wooded horizon, as well as replacing open land which forms part of

Appendix 6 – NN Solutions Report

REPORT

Solutions Report

Phosphate Mitigation Solutions

Client: West Berkshire Council

Reference: PC4122-RHD-XX-ZZ-RP-EV-0015

Status: Final/04

Date: 29 July 2024

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Document title: Solutions Report

Subtitle: Phosphate Mitigation Solutions

Reference: PC4122-RHD-XX-ZZ-RP-EV-0015

Your reference -

Status: Final/04

Date: 29 July 2024

Project name: Lambourn Phosphate Mitigation

Project number: PC4122

Classification

Project related

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Revision	Date	Description	Prepared	Checked	Approved
00	20.07.2023	Draft Version	J. Balkman and E. Harris	O. Bowers	I. Dennis
01	22.11.2023	Version 1 including long-term solutions and following Client review	E. Harris	O. Bowers	I. Dennis
02	15.01.2024	Version 2 following Client review	J. Hurn and E. Harris	O. Bowers	I. Dennis
03	28.03.2024	Version 3 including budget calculations according to Local Plan to 2041 and Action Plan	C. Brodie and E. Harris	O. Bowers	I. Dennis
04	18.04.2024	Version 4 including the Action Plan and updated Natural England position	C. Brodie	O. Bowers	I. Dennis
05	29.07.2024	Version 5 corrections to Table 4.1	C. Brodie and E. Harris	O. Bowers	I. Dennis

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Abbreviations

Abbreviation	Description
ADAS	Agricultural Development and Advisory Service
AMP	Asset Management Planning
BNG	Biodiversity Net Gain
CIRIA	Construction Industry Research and Information Association
CJEU	Courts of Justice of the European Union
CSF	Catchment Sensitive Farming
CSS	Countryside Stewardship Scheme
CW	Constructed Wetlands
DEFRA	Department for Environment Food and Rural Affairs
Dutch-N	Dutch Nitrogen Joint Cases
EIA	Environmental Impact Assessment
ELMS	Environmental Land Management Scheme
GIS	Geographic Information System
HRA	Habitats Regulations Assessment
ICW	Integrated Constructed Wetlands
LPA	Local Planning Authority
LURB	Levelling Up and Regeneration Bill
NN	Nutrient Neutrality
P	Phosphate
PTPs	Package Treatment Plants
PTWs	Portable Treatment Works
SAC	Special Area of Conservation
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TAL	Technically Achievable Limit
TP	Total Phosphorus
WBC	West Berkshire Council
WFD	Water Framework Directive
WRC	Water Recycling Centre
WwTWs	Wastewater Treatment Works
WINEP	Water Industry National Environment Programme

Units of Measurement

Unit	Description
g/m ² /yr	Grams per metres squared per year
Kg	Kilogram
kg/yr	Kilograms per year
kg/ha/yr	Kilograms per hectare per year
kg TP/d	Kilogram of Phosphate per day
kg TP/yr	Kilogram of Phosphorus per year
km	Kilometre
ha	Hectare
m	Metres
m ²	Metres Squared
m ³	Metres cubed
MI/d	Megalitres per day
mg/l	Milligrams per litre
mg TP/l	Milligrams of Phosphorus per litre
SRP/ha/yr	Orthophosphate per hectare per year
t/ha	Tonnes per hectare
t/yr	Tonnes per year
TP/yr	Total Phosphate per year
TP/ha/yr	Total Phosphate per hectare per year
Yr	Year
%	Percentage
£	Pound Sterling
£/ha	Pound Sterling per hectare
£/kg	Pound Sterling per kilogram
£/yr	Pound Sterling per year
£/kg/yr	Pounds sterling per kilogram per year

Executive Summary

Introduction and purpose of this report

Following the Dutch Nitrogen Joint Cases ('Dutch-N') in the Court of Justice of the European Union, which ruled that where a European important site, i.e., Special Areas of Conservation and Special Protection Areas, is failing to achieve condition due to pollution, the potential for a new development to add to the nutrient load is *necessarily limited*.

Similarly, internationally important wetland sites which are designated as Ramsar sites are also included in the judgement, as under national policy they are afforded the same protection as Special Areas of Conservation and Special Protection Areas. The Dutch-N case has informed the way in which Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations 2017') should apply to pollution related incidents and has resulted in greater scrutiny of proposed developments that are likely to increase nutrient loads to designated sites.

This report sets out short, medium and long-term mitigation options that could potentially be used to offset the additional nutrient load from a new development within the catchment of the River Lambourn Special Area of Conservation, including potential strategic options to manage nutrient (phosphate) inputs and allow further residential development to proceed. The range of potentially suitable and robust solutions considered within this report are subject to a comment with respect to Natural England's mitigation requirements. It was evident upon initial review that some solutions would be unviable and would not offer a sufficiently robust solution and as such were not included for consideration further within this report.

Potential nutrient mitigation options

Following a detailed review of scientific literature and best practice guidance, a range of different nutrient management solutions have been identified. The following types of solutions were identified as potentially viable for use in the River Lambourn catchment:

- Nature-based solutions: that would be implemented within a catchment to reduce diffuse-source phosphate loadings.
- Drainage and wastewater-based interventions: solutions that apply to wastewater and drainage and will require targeted interventions (excluding nature-based and wetland solutions) or specific local policies to be implemented.

The following solutions are considered in this report:

- Short-term solutions: taking land out of agricultural use; cessation of fertiliser and manure application; riparian buffer strips; wet woodlands; cover crops; bringing forward planned wastewater improvements; sustainable drainage systems; portable treatment works; alternative wastewater providers; retrofitting more water efficient fittings; package treatment plants; and cesspools.
- Medium-term solutions: constructed wetlands; beaver reintroduction; and retrofitting SuDS.
- Long-term solutions: use alternative wastewater treatment providers; rectifying misconnections within the sewer system; improvement of wastewater distribution infrastructure; and incentivising commercial water efficiency.

Housing projections

To understand the mitigation required to meet the upcoming housing requirements, a review of local plan documents and housing projections was undertaken.

Conclusions and next steps

The following sets out the next steps required to develop the solutions presented within this report to functioning nutrient mitigation solutions:

- A database or spreadsheet-based tracking tool to register and record the nutrient loading for each development and through what schemes this will be mitigated.
- A tracking tool could also be expanded to track 'credits' achieved through mitigation schemes that can be used for biodiversity net gain and carbon offsetting.
- Standardised legal agreements could be drawn up and used as a basis in future mitigation schemes. Conservation covenants are one option that should be explored.
- A Mitigation Plan should be created to formulate developer contributions. In establishing such a plan, the key solutions and timescales for expected delivery would set out in addition to the roles of relevant contributors and organisations relevant. This will allow for quantification of when and how many credits will be available.

Action Plan

The Action Plan expands on the recommended next steps listed above and aims to summarise solutions which are feasible and specific to the Lambourn catchment. Where possible, it summarises the likely costs, timescales, and delivery mechanisms. Emerging solutions which may be applicable to the Lambourn catchment are also summarised. These are potential solutions which are in the initial stages of data gathering and therefore lack information required to determine whether they fulfil the Habitat Regulations mitigation solutions criteria.

1 Introduction

1.1 Nutrient neutrality and the Dutch Nitrogen Case

A joint legal case was brought to the Court of Justice of the European Union (CJEU) regarding authorisations for schemes with respect to agricultural activities on sites protected by the *Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and species* ('The Habitats Directive') and where nitrogen deposition levels already exceeded the critical load.

Following the Dutch Nitrogen Joint Cases (the 'Dutch-N') in the CJEU which ruled that where a European important site, i.e., Special Areas of Conservation (SACs) and/ or Special Protection Areas (SPAs), is failing to achieve condition due to pollution, the potential for a new development to add to the nutrient load is "*necessarily limited*". Similarly, internationally important wetland sites which are designated as Ramsar sites are also included in the judgement, as under national policy they are afforded the same protection as SACs and SPAs. The Dutch-N has informed the way in which Regulation 63 of the Habitats Regulations 2017 should apply to new projects that could potentially exacerbate existing pollutant loads.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 brought the Habitats Regulations 2017 into force from 1 January 2021. The Dutch-N ruling has resulted in greater scrutiny of proposed developments that are likely to increase nutrient loads to internationally important sites where a reason for unfavourable condition is an excess of a specific pollutant. The Dutch-N case applies to National Site Network sites which are already in an unfavourable condition due to high nutrient levels in combination with the importance of the designation. The types of developments which are impacted include:

- New residential units, student accommodation, care homes;
- Tourist attractions including campsites, glamping pods, and holiday lets;
- Commercial developments where overnight accommodation is provided;
- Agricultural development including additional barns, slurry stores; and
- Anaerobic Digesters.

In March 2022 Natural England published updated guidance on water quality and nutrient neutrality (NN) advice (NE785) which identified a further twenty protected sites that are adversely affected by nutrient pollution. The River Lambourn SAC was identified as being in an unfavourable condition due to excessive phosphorus (P) loading. As a result, West Berkshire Council (WBC) is not able to grant planning permission for new developments that provide overnight accommodation or result in increased phosphorous export loads within the catchment of the River Lambourn SAC unless it can be clearly demonstrated that they will not have a detrimental impact in terms of P loading to the designated protected area. Natural England has advised that this can be achieved by providing appropriate avoidance and mitigation measures that result in the development being nutrient neutral.

1.2 Purpose of this report

This report discusses potential solutions that could be used to offset increased P loadings and allow development in the catchments of the River Lambourn SAC to proceed whilst remaining nutrient neutral. **Section 2** of this report provides an overview of the River Lambourn SAC and its contributing catchments. Housing projections to identify the scale of likely mitigation requirements required within the River Lambourn SAC catchment and WBC area are also laid out in **Section 2**. Potential P management solutions are

described in **Section 3**, and **Section 4**. provides a summary of the main findings of the report and recommendations for next steps.

Natural England has not reviewed this report, therefore the report has not received agreement or endorsement from Natural England.

2 Background

Natural England provide Conservation Objectives for Habitats Sites. These are referred to in the Habitats Regulations 2017 and provide a framework which informs the need for 'Habitats Regulations Assessments' (HRA) under Regulation 63 and Regulations 75 to 77.

2.1 River Lambourn SAC

Natural England's 2019 supplementary advice on the European Site Conservation Objectives relating to the River Lambourn SAC (site code: UK0030257) summarises the habitat as a classic example of a lowland chalk river. The River Lambourn is approximately 32.6 km long and has a catchment area of approximately 215 km². It has a moderate ecological status and is also designated as a Site of Special Scientific Interest (SSSI).

The River Lambourn rises 152 m above sea level north of Lambourn, flows through a rural chalk downland landscape for most of its length, and flows down to a confluence with the River Kennet east of Newbury. In its upper reaches, between the villages of Lambourn and Great Shefford, the Lambourn flows mainly through agriculturally improved pasture and arable fields. In its mid to lower reaches, south of Great Shefford to Bagnor it meanders through disused water meadow systems, wet pastures and woodlands. The river has a stable, gently meandering form, with a characteristic gravel rich substrate.

The river is fed by the chalk aquifer of the north Wessex Downs, which gives rise to highly calcareous water. Because the river is dominated by spring flow from the aquifer, the flow in the river is dependent on groundwater levels. In the upper river, the spring flows will cease entirely, and the river will dry up. This section of the river will only return once winter rains have filtered into the aquifer, and groundwater levels rise. These temporary reaches of chalk rivers are known as 'winterbourne', and they have developed their own unique ecology.

Additional habitats associated with the River Lambourn include areas of fringing reed swamp, tall fen and willow carr. The river has been modified in places by creating side channels to feed water meadows and mills, and there are a number of weirs and sluices. Despite these small modifications, the River Lambourn is regarded as one of the least-modified and least abstracted rivers in lowland England.

The qualifying features (habitats and species) with respect to the SAC designation are described as:

- H3260 Water courses of plain to montane levels with aquatic plants such as water crow-foot (*Ranunculus fluitantis* and *Callitriche-Batrachion*) vegetation;
- S1096 Brook lamprey (*Lampetra planeri*); and,
- S1163 Bullhead (*Cottus gobio*).

Figure 2.1 shows the River Lambourn surface water catchment:

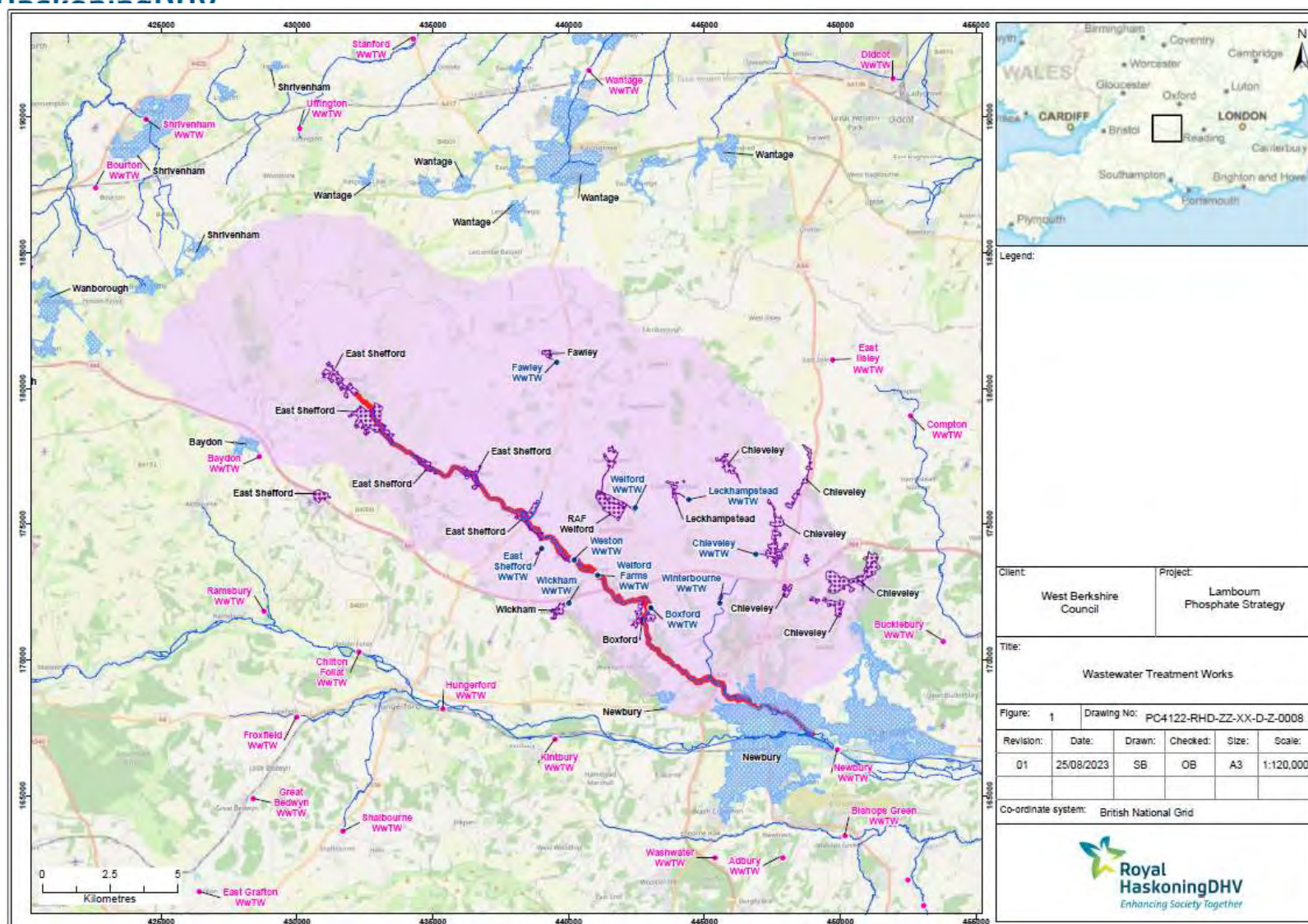


Figure 2.1: River Lambourn Catchment

2.2 Projected mitigation requirements

2.2.1 Methods and approaches

A review of the emerging local plan data and housing projections was undertaken to understand the mitigation required to meet the upcoming housing requirements. The additional P loading from the projected housing was calculated using the West Berkshire commissioned River Lambourn Phosphate Budget Calculator (The Calculator) (Royal HaskoningDHV, 2023). The parameters and values of The Calculator have been agreed upon following consultation with Natural England and replaces the previous version (Natural England 2022). Worst-case scenarios were assumed to ensure the P loading value is not understated and to provide the precautionary approach required by case law. For example, conservative assumptions were taken on future permit limits and land use types.

The following approach was used and assumptions were selected based on evidence:

- Local Planning Authorities (LPAs) are required by law to produce an annual report which demonstrates whether they have a deliverable supply of homes to meet their planned housing requirement over the next five years. Nutrient neutrality (NN) guidance has affected the delivery of new housing and therefore the five-year land supply. As such the delivery of housing is a key pressure, more so than other accommodation types, and is therefore the focus of this report;
- All new dwellings were assumed to be houses with an average occupancy of 2.38 persons per dwelling;
- It is assumed by Natural England that anyone living in the NN catchment also works and uses facilities in the catchment. Therefore, wastewater generated by commercial and industrial development is not considered, removing the potential for double counting of human wastewater arising from different planning uses;
- Other types of overnight accommodation, e.g., campsites, holiday homes, hotels, etc., that do not fall under the same use class as dwelling houses (Class C) are not considered, as there are no projections on the likelihood or number of these accommodation types being brought forward;
- The previous land use of the sites was derived from aerial imagery;
- Where the land use type was uncertain, it was assumed to be general arable which represents one of the dominant land use types in the catchment and has a runoff coefficient close to the average of all the land uses;
- The proposed land use following development was assumed to be medium-density urban;
- The soil drainage type was derived from Soilscales (Cranfield Soil and AgriFood Institute, 2018)¹ and the dominant soil type was found to be freely draining in the upper Lambourn catchment and impeded drainage in the lower reaches of the catchment;
- The Wastewater Treatment Works (WwTWs) that a proposed development will drain to was estimated using Geographic Information System (GIS) data on the existing catchment;
- A 20% buffer was applied to the calculations in line with Natural England guidance on NN (Natural England, 2022);
- A water usage standard of 120 litres/person/day and an effluent concentration at 90% per permit are applied; and,

¹ [Soilscales soil types viewer - Cranfield Environment Centre. Cranfield University \(landis.org.uk\)](https://landis.org.uk)

- The catchment that a development will contribute the P loading to was determined by the location of the WwTWs (also referred to as Water Recycling Centres (WRCs). Some developments will be located in one surface water catchment, but the wastewater (and majority of the nutrient contribution) will drain to a different catchment.

It was assumed that all developments currently held up would require nutrient mitigation by the end of 2025, and some developments are delayed to significant extent in which they require immediate mitigation solutions. This assumption ensures that mitigation requirements reflect the realistic demand for mitigation. The calculations consider reductions in permit limits that will take effect at the end of the Asset Management Planning (AMP) 7 Cycle (January 2025). Examples of WwTW with a reduction in the permit limit from January 2025 include Chieveley WwTW from 0.9 mg/l TP to 0.4 mg/l TP and East Shefford WwTW from 0.9 mg/l TP to 0.09 mg/l TP.

Furthermore, proposed 2030 permit limit reductions were also included following the Department for Levelling Up, Housing and Communities announcement (18th November 2022). It was assumed that only WwTWs with a current Population Equivalent (PE) of greater than 2,000 residents would be operating at Technically Achievable Limit (TAL) by 2030. The TAL for TP is 0.25 mg/l. It is assumed within the calculations that planned upgrades to WwTWs will be implemented by 2030 at the latest, however information on the target dates and scale of these improvements is pending confirmation from the water company and DEFRA (expected May 2024). It is noteworthy that some WwTWs may not achieve TAL, particularly smaller WwTWs and Chieveley is assumed to be operating at TAL.

2.2.2 Housing budget projections

The projected housing growth was derived from the Draft Local Plan (currently at Inquiry) and current planning applications.

A total of 872 dwellings are projected to be constructed across approximately 81.6 ha within the catchment. The total area was calculated by adding the area from each existing allocation, application and an area of 0.04 ha/dwelling (equivalent to 25 dwellings per hectare) was assumed for neighbourhood plans and Windfall. WBC advised a search had been undertaken on dwellings currently held up at Reserved Matters and Condition Discharge stages as well as current full and outline applications. A review of all planning applications submitted to the LPA within the Lambourn catchment since the 16th of March 2022 notification has been undertaken to determine the residential units currently held up due to nutrient neutrality requirements.

The number of dwellings associated with windfall was derived using values given within the Draft Local Plan. The plan notes the number of windfall dwellings is based on previous data and the number up for 2025-2041 is 140 dwellings per annum. The maps within the Draft Local Plan have been used to establish approximately 25% of 140 is relevant to the Lambourn SAC catchment and 35 dwellings per year is based on this.

Table 2.1 provides a breakdown of the number of dwellings and their status.

Table 2.1: Development status and number of dwellings in West Berkshire District

Status	No. of Proposed Dwellings across Plan Period	Source
Existing applications	133	Supplied by West Berkshire Council Planning Application Search
Allocations	154	West Berkshire Emerging Local Plan allocations including windfall
Windfall	560 (35 dwellings per year)	

Status	No. of Proposed Dwellings across Plan Period	Source
Five-year land supply (minus allocated sites)	25	West Berkshire Emerging Local Plan Five-Year Land Supply Position
Total	872	

The following equation was used to calculate the phosphorus loading requirements per development.

$$TP_{loading} = \left(\frac{D \times O \times W \times C}{1000000} \times 365.25 \right) + \left((A \times R_f) - (A \times R_c) \right) \times P$$

Where:

$TP_{loading}$ = The TP loading (kg/yr), D = No. of dwellings, O = occupancy rate (persons/dwelling), W = water usage (l/person/day), C = effluent concentration (mg/l), A = surface area of site (m²), R_f = future land use runoff coefficient (kg/ha/yr), R_c = current land use runoff coefficient (kg/ha/yr) and P = Precautionary buffer.

Equation 1: Phosphorus loading requirements per development

The expected excess P loading per year across the NN catchment area is provided in **Table 2.2** and the total amount of P required to be mitigated per year is represented visually in

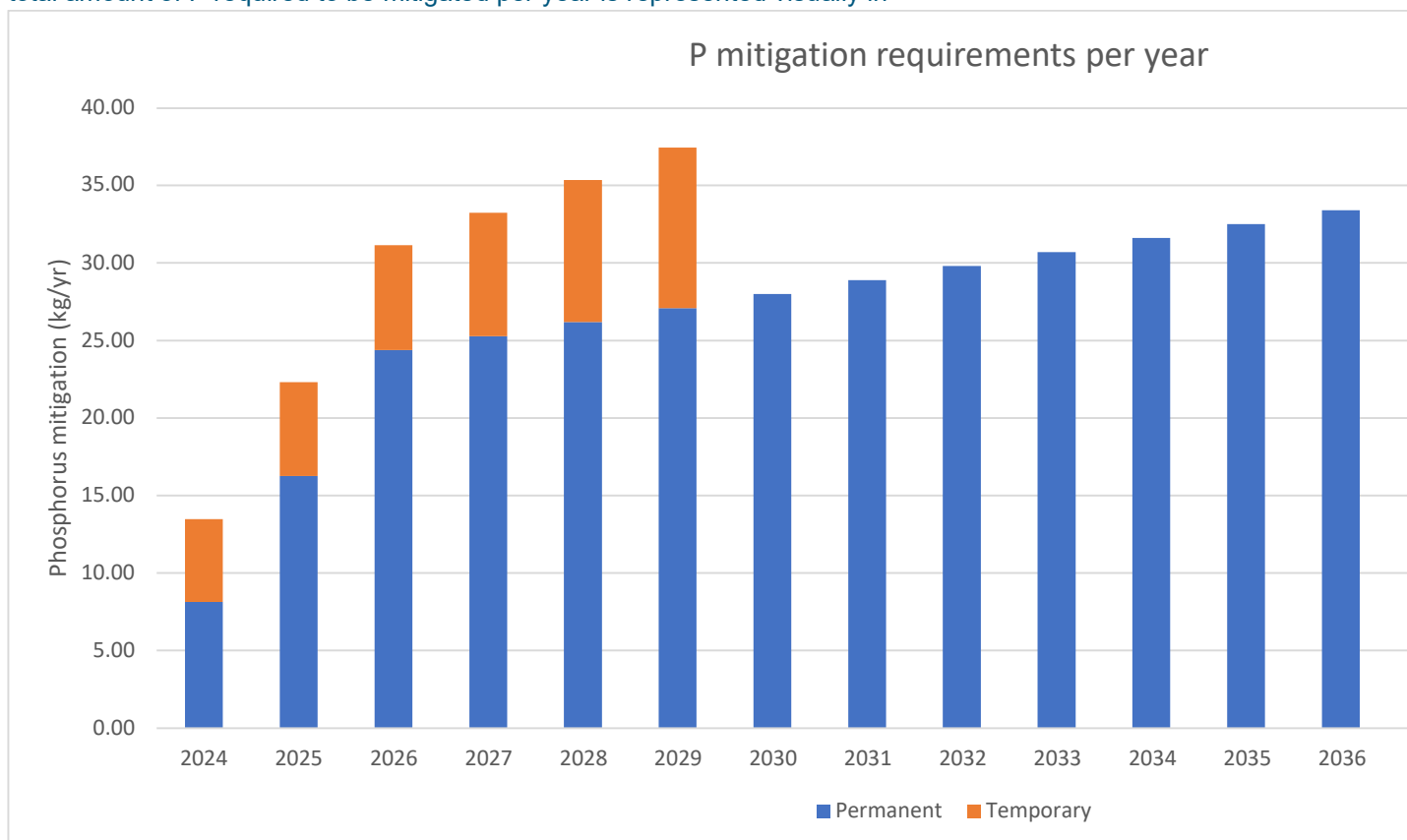


Figure 2.2. This includes both temporary mitigation (required until planned upgrades at wastewater treatment works are completed) and permanent mitigation (required for the duration of the development).

The total mitigation required up to 2041 is 48.28 kg/yr. In 2024 the total TP mitigation required is 13.48 kg/yr. The comparatively high mitigation requirements during this period reflects the immediate need for mitigation for the dwellings currently held up in the planning system and the higher effluent permit limits prior to planned



technical upgrades and permit reductions post 2025. The TP loading per year in 2025 and 2026 is 8.83 kg/yr, between 2026-2029 is approximately 2.10 kg/yr for each year and between 2030-2041 is 0.90 kg/yr. These values were calculated using the available data set out in this section and equation 1. A value of 0.06 kg/yr/dwelling is calculated from dividing the budget total in Table 2.2 by the total number of dwellings in Table 2.1.

Table 2.2: Total P loading and mitigation required across the West Berkshire District Plan period

Mitigation type	Phosphorus loading over the Plan period (kg/yr) (per year)																			
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	Total	
Permanent	8.13			0.90																37.92
Temporary	5.36	0.70		1.20			0.00													10.36
Total	13.48	17.66		6.31			10.83													48.28

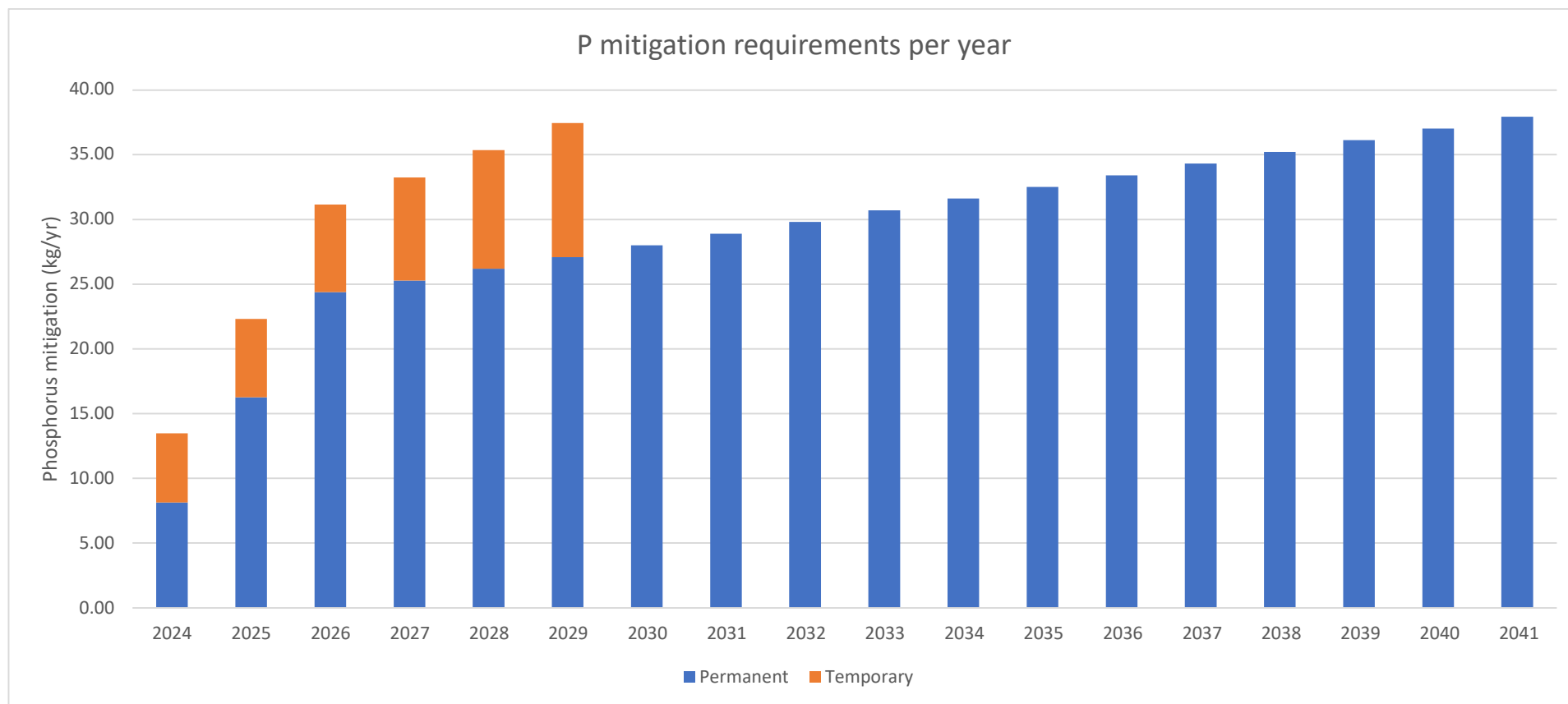


Figure 2.2: Total P mitigation required per year across the Plan period

3 Potential nutrient management solutions

The general characteristics of the Lambourn catchment are described in **Section 2.1**. The catchment characteristics are defined further:

- Upper Lambourn: typically freely draining soils, with an average rainfall of 700-900 mm/yr and comprising primarily arable land; and
- Lower Lambourn: typically slightly impeded soils, with an average rainfall of 600-700 mm/yr and comprising primarily arable land.

3.1 Types of nutrient management solution

This section outlines potential solutions that can be used to achieve P mitigation for the purpose of allowing planning applications to proceed by demonstrating nutrient neutrality. Solutions where there is the potential to comply with Natural England's HRA principles (such as using the best available objective and scientific information, proportionate, precautionary and seurable in perpetuity) were assessed further (Natural England, 2023). The solutions have been classified into the four following categories:

- Nature-based solutions: solutions that aim to use natural processes (physical, chemical, and biological) to reduce diffuse- and point-sources of nutrients from within a catchment;
- Runoff management solutions: solutions that aim to reduce nutrient supply through the management of surface runoff and sediment supply (excluding nature-based solutions);
- Wastewater management solutions: solutions that aim to manage wastewater as a source of nutrients (excluding nature-based solutions); and
- Demand management solutions: solutions that aim to reduce nutrient loadings by reducing the production of wastewater at source, e.g., reduced water usage of residential properties.

Some established solutions for P management at a catchment-scale do not provide the certainty that is required for mitigating new developments and therefore have not been assessed. Examples of established solutions include:

- Methods adopted by Catchment Sensitive Farming (CSF) which is a government land management initiative (Natural England, 2022) that provides support such as:
 - farm advice; and
 - training and capital grants targeted at priority catchments to help reduce soil erosion and nutrient losses to water (air and soil).

The following section presents a brief overview of the potential short, medium and long-term nutrient management solutions that are considered and describes how they are appraised (**Section 3.2**). This is followed by a more detailed description and appraisal of Nature-based Solutions, which this report focusses on (**Section 3.3**), Runoff Management Solutions (**Section 3.3.2**), Wastewater Management Solutions (**Section 3.3.3**) and Demand Management Solutions (**Section 3.3.4**).

3.2 Overview of potential nutrient management solutions

The potential P management solutions that are considered are listed in **Table 3.1**. This overview table provides an indication of the timescales in which the solution could be delivered. A full description of each solution is provided in the subsequent sections of this report, as indicated by the cross references provided in **Table 3.1**. Natural England advice on mitigation principles which was issued to LPAs in March 2022 was

used to assess the suitability of solutions and to facilitate the solutions in meeting the requirements of the Habitat Regulations.

Table 3.1: Potential nutrient management solutions

Type of Solution	Solution	Delivery Timescale	Further Information
Nature-based	Silt traps	Short-term	Section Error! Reference source not found.
	Riparian buffer strips	Short-term	Section 3.3.1.1
	Wet woodlands	Short-term	Section 3.3.1.3
	Constructed wetlands	Medium-term	Section 3.3.1.4
	Willow buffers	Short-term	Section 3.3.1.4
	Beetle banks	Short-term	Section 3.3.1.6
	Beaver reintroduction	Medium-term	Section 0
Run-off management	Taking land out of agricultural use	Short-term	Section 3.3.2.1
	Conversion of agricultural land to solar farms	Short-term	Section 3.3.2.2
	Cessation of fertiliser and manure application	Short-term	Section 3.3.2.3
	Cover crops	Short-term	Section 3.3.2.4
	Installation of SuDS in new developments	Short-term	Section 3.3.2.5
	Retro-installation of SuDS in existing developments	Medium-term	Section 3.3.2.6
	Paddock management	Short-term	Section 3.3.2.7
Wastewater management	Expedite planned improvements to treatment works	Short-term	Section 3.3.3.1
	Improvements to wastewater treatment works	Medium-term	Section 3.3.3.2
	Installation of cesspools and capture outputs from private sewage systems	Short-term	Section 3.3.3.3
	Replacement of package treatment plants / septic tanks	Short-term	Section 3.3.3.4
	Installation of portable treatment works	Short-term	Section 3.3.3.5
	Use alternative wastewater treatment providers	Long-term	Section 3.3.3.6
	Rectifying misconnections to combined systems	Long-term	Section 3.3.3.7
	Improve existing wastewater distribution infrastructure (reduce leakage from foul sewer network)	Long-term	Section Error! Reference source not found.
Demand management	Retrofit water saving measures in existing properties (local authority, registered providers, public buildings)	Short-term	Section 3.3.4.1
	Incentivise commercial water efficiency	Long-term	Section 3.3.4.2

3.2.1 Description of nutrient management solutions

The terminology used to describe the characteristics, performance and evidence base for each option in the subsequent sections is set out in **Table 3.2**.

Table 3.2: Description of nutrient management terminology

Descriptor	Definition
Description of solution	This section provides an overview of the P management solution and the activities required for its implementation.
Delivery timescale	<p>Delivery timescales are classified as follows:</p> <ul style="list-style-type: none"> Short: The solution could potentially be implemented in one year or less. Planning permission, policy changes and significant funding are not likely to be required, although it may be necessary to obtain third party consents and agreements. Medium: The solution could potentially be implemented over a period of one to five years. Planning permission, policy changes and/ or third-party funding are likely to be required, alongside other third-party consents and agreements. Long: It is likely to take more than five years to implement the solution. Environmental Impact Assessment (EIA), major policy changes and/ or significant funding are likely to be required, alongside other third-party consents and agreements.
Duration of operation	<p>The longevity of the solution is classified as follows:</p> <ul style="list-style-type: none"> Temporary: The solution is likely to remain in place for up to five years and could be secured through interim or temporary agreements with third parties. Impermanent: The solution is likely to remain in place for between five and 10 years, secured in agreement with third parties. Permanent: The solution is likely to remain in place for more than 10 years and could be secured in perpetuity through long term agreements with third parties.
Nutrient removal	This section provides a summary of the nutrient removal that the solution could potentially deliver.
Applicability	This section provides a high-level summary of the potential applicability of the solution in the catchment(s), including constraints posed by farm type, land use, etc.
Management and maintenance	This section describes the management and maintenance activities that are required to maintain the effectiveness of the solution.
Additional benefits	This section provides a description of any additional secondary benefits that could be delivered alongside the primary nutrient management aim of the solution.
Best available evidence	<p>Sufficient reliable evidence which provides certainty that mitigation may be effective.</p> <p>It should be noted, with some types of mitigation there will be, (particularly with novel or complex mitigation), uncertainty as to the exact effectiveness the mitigation may deliver.</p>
Wider environmental considerations	This section provides a description of any wider environmental constraints that could be associated with the solution. Potential unintended consequences are considered within this section.
Evidence of effectiveness	This section summarises any evidence available to demonstrate the effectiveness of the solution in managing nutrient supply.
Precautionary	The precautionary principle is an approach to ensure sufficient certainty via application of a precautionary efficacy value based on the evidence can be applied, or provision of greater mitigation than required. For example, monitoring efficacy of a mitigation measure may provide evidence and therefore certainty which can be relied upon.
Securable in perpetuity	Natural England Nutrient Neutrality Principles guidance (Wood <i>et al.</i> , 2022) defines 'in perpetuity' timeframe between 80-125 years and 'securable' is defined as practical certainty that the mitigation measures will be implemented and in place at the relevant time.

Descriptor	Definition
	Mitigation measures which can be secured through legally binding obligations that are enforceable are understood to be securable in perpetuity. Likewise, a mitigation measure which can offer tax relief or a grant for example, although not legally enforceable, is considered to offer a degree of security.
Cost estimate	This section provides an outline estimate of the costs associated with implementing the solution. Costs are given over 80 years (the lifetime of the development) to allow for direct comparison with long-term solutions. Costs typically exclude administration and legal costs which are likely to apply to all solutions. Costs also exclude development of monitoring regimes to measure the effectiveness.

3.3 Short-term, medium-term & long-term solutions

3.3.1 Nature-based solutions

3.3.1.1 Silt traps

Silt traps can be installed on farms to intercept sediment bound phosphorus and prevent the nutrients from entering the surface drainage network. Error! Reference source not found. shows an example of a silt trap in situ and Error! Reference source not found. provides an overview of silt traps as a solution.



Figure 3.1: Silt trap installed in a stream (Source: IRD Duhallow, 2015)

Table 3.3: Key considerations of silt traps

Descriptor	Definition
Description of solution	<p>Silt traps / engineered logjams can be installed on farms to catch sediment bound P. Silt traps are basins set upstream that capture sediments. Fine sediments to which P is bound become physically immobilised, i.e., deposited, behind a barrier due to a reduction in flow energy, decreasing the volume of sediment and therefore P within the watercourse.</p> <p>As a result of its early removal, there is also a reduced potential for P to become soluble further downstream and detrimentally impact water quality. The benefits of silt traps for water quality are well established.</p>

Descriptor	Definition
Delivery timescale	Silt traps require limited infrastructure and, depending upon their location, may not require any environmental permits. They can therefore be delivered as a short-term solution.
Duration of operation	Silt traps are predominantly considered an impermanent solution due to the need for maintenance to remain effective (see Management and Maintenance below). Natural England's framework for assessing engineered logjams (NECR545) (Lloyd et. al, 2024a) indicates that this solution cannot be as a permanent solution for phosphorus mitigation.
Nutrient removal	The P removal rate of silt traps is dependent on site-specific variables such as location, soil type, rainfall, frequency of de-silting and is likely to differ between locations. Silt trap schemes should not be reliant upon water supply from one single upstream surface water source as this does not provide sufficient certainty of the long-term nutrient removal. The Environment Agency (2012) Rural Sustainable Drainage Systems (RSuDS) guidance indicates that TP removal is regularly reported between 25-75% for well-designed and sited systems during design condition events. A conservative estimate of 25% can be used as a guide for predicting nutrient removal, however, cannot be relied upon for securing mitigation. Natural England's framework indicates that a removal rate can only be determined through robust baseline and postImplementation monitoring.
Applicability	All farm typologies applicable, particularly farms which have a high risk of silt runoff.
Management and maintenance	Silt traps would need to be maintained periodically to remove accumulated fine sediments and ensure that they remain effective as sediment and nutrient traps. Fine sediments removed from the silt traps would need to be disposed of appropriately to prevent them becoming a new source of nutrients in the catchment.
Additional benefits	Silt traps are effective in improving the quality of water in the drainage network by reducing sediment supply to downstream watercourses. This can result in improved habitat quality for aquatic plants, invertebrates and fish.
Best available evidence	Although there is considerable evidence that supports the use of silt traps as effective measures to remove sediment from flowing water, e.g., Environment Agency (2011), there is limited evidence of their effectiveness in removing nutrients.
Wider environmental considerations	Periodic removal of the sediment containing nutrients and any other chemicals which have collected requires consideration with particular respect to re-use or waste disposal in addition to any environmental considerations related to removal and transport.
Evidence of effectiveness	This solution is effective beyond reasonable scientific doubt. Although there is evidence to indicate effective sediment capture, the effectiveness can vary considerably under different conditions, poor design and poor management. As such, there is currently uncertainty regarding nutrient removal rate.
Precautionary	Yes – with the assumption that the 25% is adopted a precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	Yes – management agreements will likely need to be put in place, especially where land is leased. Replacements will be required as the lifetime of the silt trap (approximately 30 years) is less than the developments.
Cost estimate	Capital costs are between £1,000-£4,000 with additional maintenance costs of £500 per annum.

3.3.1.2 Riparian buffer strips

Riparian buffer strips can be created around a watercourse to create separation between itself and an agricultural field. **Figure 3.2** shows an example riparian buffer strip, and **Table 3.4** provides an overview of them as a solution.



Figure 3.2: Aerial view of a riparian buffer strip (Source: Iowa State University Forestry Department, 2016)

The removal rates for the Lambourn for this type of solution have been calculated using a 29% removal rate as a precautionary value based on data provided in Natural England's framework for assessing riparian buffer strips (NECR541) (Lloyd *et al.*, 2024b).

Table 3.4: Key considerations of riparian buffer strips

Descriptor	Definition
Description of solution	<p>Riparian buffer strips are zones of permanent grass and/ or woodland cover greater than 5 m wide that act as a separation barrier and filter between an agricultural field and a watercourse. They can also act as a filter between point sources of nutrients and the surface drainage network.</p> <p>Nutrient reductions are achieved through sedimentation of P-bound particles and uptake via vegetation. Vegetation within buffer strips increases surface roughness and reduces runoff rates, which in turn promotes infiltration (Hoffman <i>et al.</i>, 2009).</p> <p>Riparian buffer strips are typically located at field margins (less productive areas) and are, therefore, more likely to be adopted by farmers. This provides good certainty that the land use will be maintained and not revert back to agriculture. The upstream sources are important to maintaining the predicted removal rates from the buffer strips. If these sources are altered or removed, then the nutrient removal of the buffer could be adversely impacted. A minimal amount of monitoring will be required to confirm removal rates are consistent with the predicted rate. This is likely to comprise six months to yearly for approximately the first five years, then every 10 years for the lifetime of the scheme.</p> <p>Nutrient credits are earned by reducing nutrient outputs to below quota targets. The lower the nutrient output of a source, the greater number of quota targets are met, and credits earned. Therefore, should a riparian buffer strip outperform its predicted design capacity, this will be identified by the monitoring process and allow the additional nutrient removal to be used as nutrient credits.</p> <p>Key considerations of riparian buffer strips include the following:</p> <ul style="list-style-type: none"> Where buffer strips are used as a long-term, in perpetuity solution, the long-term management of the adjacent fields presents a risk. Should the adjacent land be taken out of agricultural use or significant changes in agricultural practices, e.g., conversion to solar or wind farm, this could reduce the phosphorus sources and subsequent removal potential. Improper upkeep of buffer strip vegetation; fencing and excess silt could reduce the removal potential. Should overland flow not be maintained, and flow becomes channelised, the buffer strip will not operate at optimum removal rates.

Descriptor	Definition																		
	Farmers may be unwilling to commit to 80-year agreements initially. Therefore, shorter agreements, e.g., 20-30 years, may be necessary to establish this solution, with the ability to renew agreements.																		
Delivery timescale	Buffer strips do not require extensive infrastructure or investment, although fencing may be necessary where used in livestock farming. They do not require planning or environmental permits and can therefore be delivered in the short term.																		
Duration of operation	Buffer strips are likely to be operational over long timescales, depending upon landowner agreements. However, because they do not require any specific infrastructure, they are considered impermanent and subject to changes in farming practices.																		
Nutrient removal	<p>P removal efficiency increases with buffer width, with 15-20 m buffers being the most effective (seen in Figure 3.3).</p> <p>Buffer strips composed of woody material can store a significant amount of P biomass (Fortier <i>et al.</i>, 2015), and are more effective at trapping sediment than grasses (Hoffmann <i>et al.</i>, 2009; Anguiar <i>et al.</i>, 2015).</p> <p>Soil type may affect P removal efficiency, for example loam soils typically have lower P removal rates than silt soils when buffer strips consist of grass (Lee <i>et al.</i>, 1998; Chaubey <i>et al.</i>, 1995). Site-specific factors also play a role in controlling nutrient reductions from riparian buffer strips and should be considered when considering the most appropriate location for buffer strip placement. For example, the orientation of the buffers and the adjacent agricultural activity are both important considerations. Typically, riparian buffers adjacent to agricultural land used for cropping will achieve the greatest real-world reduction rates due to the potential to remove a high degree of phosphorus bound sediment in the runoff.</p> <p>Natural England's framework provides the following efficacy coefficients:</p> <table> <tr> <th>Riparian buffer strip width</th><th>TP reduction efficacy</th></tr> <tr> <td>10m+</td><td>0.22</td></tr> <tr> <td>12m+</td><td>0.25</td></tr> <tr> <td>15m+</td><td>0.29</td></tr> <tr> <td>18m+</td><td>0.32</td></tr> <tr> <td>20m+</td><td>0.34</td></tr> <tr> <td>24m+</td><td>0.38</td></tr> <tr> <td>25m+</td><td>0.39</td></tr> <tr> <td>30m+</td><td>0.43</td></tr> </table> <p>The efficacy values presented above assume that a 2m buffer strip is already in place. This ensures that any buffer strip used for mitigation are consistent with the legal baseline.</p> <p>The phosphorus removal rates for a 15m buffer are expected to be:</p> <ul style="list-style-type: none"> 0.30 kg/ha/yr (range 0.09 – 0.63 kg/ha/yr) in the upper Lambourn catchment; and 1.27 kg/ha/yr (range 0.37 – 2.67 kg/ha/yr) lower Lambourn catchment. <p>It is noted that the greatest potential for riparian buffer strip uses exists within the upper catchment because this is where most of the arable land is located.</p>	Riparian buffer strip width	TP reduction efficacy	10m+	0.22	12m+	0.25	15m+	0.29	18m+	0.32	20m+	0.34	24m+	0.38	25m+	0.39	30m+	0.43
Riparian buffer strip width	TP reduction efficacy																		
10m+	0.22																		
12m+	0.25																		
15m+	0.29																		
18m+	0.32																		
20m+	0.34																		
24m+	0.38																		
25m+	0.39																		
30m+	0.43																		

Descriptor	Definition
Applicability	Can be applied to all agricultural land and farm typologies where land is suitable for riparian buffers to be grown.
Management and maintenance	<p>Maintenance is predominantly limited to cutting vegetation and the removal of accumulated sediment. Woodland buffers, particularly those containing willow, have less onerous maintenance requirements than grassland buffers.</p> <p>Where input flows are too great to promote infiltration, ponds could be added to remove sediment and would also need to be de-silted.</p> <p>Monitoring of management practices and water quality will be required to establish both the baseline and the post-establishment functionality.</p>
Additional benefits	<ul style="list-style-type: none"> ▪ Riverbank stabilisation ▪ Improved water quality ▪ Erosion reduction ▪ Habitat creation ▪ Improved amenity value ▪ Biodiversity Net Gain (BNG) ▪ Carbon offsetting – potential for stacking ecosystem services credits carbon offsetting and BNG could provide an additional revenue stream, similar to the Countryside Stewardship payment scheme
Best available evidence	Riparian buffer strips are an established nature-based solution for pollution control within catchments and have been employed for multiple years.
Wider environmental considerations	<p>Buffer strips may support sensitive species or communities and may need management to avoid damaging these. Fenced-off buffer strips may limit livestock access to a water source and wildlife throughways. Alternative water sources and fenced throughways may be required.</p> <p>Where groundworks are operating within a flood zone then it is important that the flood storage area is not reduced.</p>
Evidence of effectiveness	This method is effective beyond reasonable scientific doubt.
Precautionary	<p>Yes – a precautionary approach can be applied to this solution until and after site specific information becomes available.</p> <p>Using Natural England framework, a 2m buffer strip is already assumed.</p>
Securable in perpetuity	<p>Yes – management agreements may be needed where the solution is intended to provide medium/ long term solutions to ensure it does not revert to agricultural use and is maintained correctly.</p> <p>Conservation covenant agreements can be a mechanism for securing perpetuity.</p>
Cost estimate	Typical annual costs are approximately £786/ha, with an approximate upfront cost of £183/ha (Farmscoper, 2023). This accounts for costs from loss of production, seasonal cutting and annual establishment, as well as cost savings from no crop management. This is fairly well constrained with annual Countryside Stewardship Grants that are paid at £440 - £512 ha/yr. It is not possible to stack Countryside Stewardship Grants with Nutrient Neutrality.

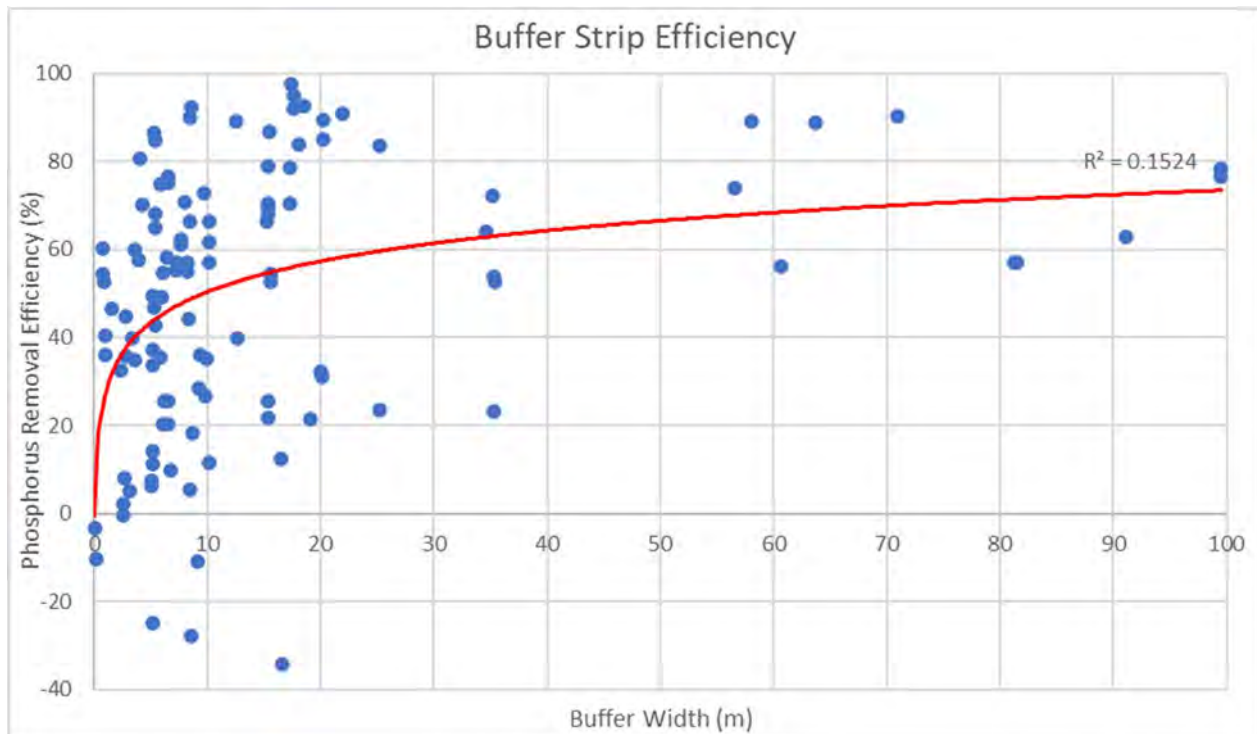


Figure 3.3: Buffer strip efficiency by width (edited from Tsai et al., 2016)

3.3.1.3 Wet woodlands

Wet (floodplain) woodlands can be created or restored on river floodplains and remove nutrients from the watercourse by enhancing sediment deposition and nutrient uptake by plants. **Figure 3.4** shows a created area of wet woodland, and

Table 3.5 provides an overview of wet woodlands as a solution.



*Figure 3.4: Area of wet woodland created in Salford in 2016. The project led to the attenuation of pollutants by biodegradation
(Source: Natural Course, 2017)*

Table 3.5: Key considerations of wet woodlands

Descriptor	Definition
Description of solution	<p>Wet woodlands occur on soils that are permanently or seasonally wet. Wet woodlands increase hydraulic roughness, which slows flow velocities and allows sediment and particulate bound pollutants to fall out of suspension and enter storage on the floodplain, or in a designed wetland setting. Riparian woods reduce diffuse pollution by trapping fine sediment runoff generated by agricultural practices.</p> <p>Nutrient removal strategies involve either restoring existing floodplain woodland or creating new areas of planting. Natural Flood Management interventions can divert water out of the channel and into the floodplain wetland.</p> <p>Reversion of areas to floodplain woodland could deliver nutrient mitigation of land which is naturally wet, not only reducing the impact of runoff from the agricultural land, but also increasing the connectivity of the woodland. This would likely achieve greater nutrient reductions than purely the change of land use would predict.</p>
Delivery timescale	Wet woodlands do not require extensive infrastructure, investment, planning or environmental permits, and can therefore be delivered in the short term. However, the relatively slow growth rate of trees means that it may take some time before they become fully effective.
Duration of operation	Wet woodlands are likely to be operational over long timescales, depending upon landowner agreements. Because of the long timescales required for them to become established, wet woodlands are considered to be permanent features.
Nutrient removal	<p>TP removal potential: Uncertain – likely to be similar to riparian buffers (Median TP retention rates of 67%).</p> <p>Data on nutrient removal rates in wet woodlands is scarce. A study by Olde Venterink <i>et al.</i> (2006) analysed floodplain communities and their relative abilities to influence water quality through nutrient retention, though this does not consider key elements such as sediment trapping and associated standing water. Due to the lack of reliable literature, TP removal rates are assumed to have some similarities to riparian buffer strips.</p> <p>The phosphorus removal rates are expected to be:</p> <ul style="list-style-type: none"> 0.57 kg/ha/yr (range 0.17 – 1.20 kg/ha/yr) in the upper Lambourn catchment; and 2.42 kg/ha/yr (range 0.70 - 5.06 kg/ha/yr) lower Lambourn catchment.
Applicability	Wet woodlands can be created on riparian land holdings that are likely to be inundated regularly, e.g., within the functional floodplain and/ or Flood Zone 3, as defined by the Environment Agency.
Management and maintenance	<p>Wet woodlands by their nature thrive on non-intervention and limited to no management. Light management includes:</p> <ul style="list-style-type: none"> Coppicing some areas to create a more diverse woodland structure with some clearings; Allowing woodland edges to grade upwards from grass, through scrub, to woodland; Coppicing to provide wood fuel; Managing areas of willow and scrub to maintain some open areas and wet scrub; Controlling invasive species, e.g., Himalayan balsam (<i>Impatiens glandulifera</i>).
Additional benefits	<ul style="list-style-type: none"> Recreation Carbon sequestration Biodiversity conservation Air pollution reduction Flood risk reduction Short rotation coppice utilised as biofuel
Best available evidence	No – there is doubt over removal rates due to lack of research and data.

Descriptor	Definition
Wider environmental considerations	Once established, wet woodland could potentially support sensitive species and as such may need careful management to avoid adversely affecting these species. Care should be taken to ensure that the creation of wet woodlands does not contribute to the spreading of invasive species.
Evidence of effectiveness	There is limited scientific evidence to demonstrate with certainty that wet woodlands are effective at mitigating TP. As such, there is currently uncertainty regarding nutrient removal rate and monitoring is likely to be required.
Precautionary	Yes – a precautionary approach can be applied to this solution via using the minimum (<35%) removal rate, as per the approach taken with riparian buffer strips in Section 3.3.1.2 until and after site specific information becomes available.
Securable in perpetuity	Yes – it is anticipated that this solution will be suitable for the lifetime of the development. Land that is suited to wet woodland is very unlikely to revert to any other land use.
Cost estimate	<p>Bare root stock suitable for tree planting programmes for typical wetland species are in the range of £2-£3 per tree, which may be reduced to <£1 if ordered in bulk from suppliers. Bulk order tree guards are a similar price. For broadleaved trees, planting density is recommended 1,600 to 2,500 trees per hectare (Creating Tomorrow's Forests, 2021).</p> <p>However, these figures are for general woodland creation, not floodplain wet woods where additional space may be needed for wetland landscaping, e.g., pools and scrapes. Typical planting costs (trees + guard) may be ~£5,000 per ha. Grants of up to £10,000/ ha could be available through the government's England Woodland Creation Offer (Gov.uk, 2022) and nutrient mitigation credits may need to match this figure.</p> <p>Total costs: up to £10,000/ha.</p>

3.3.1.4 Constructed wetlands

Constructed wetlands (CW) have been used for nutrient removal and water treatment since the 1950s for improving water quality from industrial and agricultural water sources (Vymazal, 2010). CWs are designed to facilitate natural processes that can remove nutrients from the influent water source(s) to a wetland (Vymazal, 2010). Key considerations of constructed wetlands are presented in **Table 3.6**.

Table 3.6: Key considerations of Constructed Wetlands

Descriptor	Definition
Description of solution	Nutrient removal occurs through natural process such as physical, biogeochemical, and biological. ICW have proven to be the most effective in removing nutrients such as P.
Delivery timescale	<p>CWs require engineering design and construction and may require planning permission, an environmental permit and an impounding licence. Depending on the watercourse, it is likely that a flood defence consent and a flood risk activity permit may also be needed. The River Lambourn catchment is characterised by a groundwater driven flow regime from the underlying chalk bedrock aquifer, overlaid by alluvial deposits offers viable opportunity for effective CW systems. The gentle gradient and meandering planform of the river together with the LiDAR mapping, ground truthing and historical evidence of a past braided river system underscore the connectivity of water levels between floodplains, tributaries, and the main channel, suggesting suitability for implementing effective nutrient removing CW.</p> <p>It is estimated that a CW scheme for nutrient removal will take between one to two years to complete.</p>
Duration of operation	With an appropriate management and maintenance plan, it is likely CWs will be able to provide nutrient mitigation in perpetuity.
Nutrient removal	TP retention in wetlands occurs through physical processes such as soil/ sediment accretion, sediment adsorption, chemical precipitation, and burial of organic P (Vymazal, 2007). Biological processes include microbial and plant uptake convert P into forms that are available for biological uptake. It should be noted that P does not cycle to gaseous forms and thus is retained within wetlands, rather than being permanently removed.

Descriptor	Definition
	<p>Various studies have shown that even with minimal intervention, CWs have maintained a high percentage removal efficiency for P (Cooper <i>et al.</i>, 2020).</p> <p>Nutrient removal rates are highly variable and should be derived following advice published in the Constructed Wetlands Framework (Johnson, 2022).</p>
Applicability	Intensively farmed catchments with likely sources of agricultural runoff would result in a large nutrient source and be suitable for deployment of agricultural wetlands
Management and maintenance	<p>Wetlands require periodic maintenance to remove sediment built up approximately every five to ten years. Vegetation will need to be replaced at a timescale appropriate to the lifecycle of the vegetation the wetland is planted with.</p> <p>Natural England's wetlands framework provides details of the aspects of a management and maintenance plan that will be needed for CW for nutrient removal (2022).</p>
Additional benefits	<p>A well designed and located ICW can provide:</p> <ul style="list-style-type: none"> ▪ Biodiversity improvements, ▪ Water quantity and quality (additional to nutrients) management, ▪ Flood hazard management, ▪ Carbon offsetting, and ▪ Amenity and landscape aesthetic benefits (Harrington & McInnes, 2009)
Best available evidence	Yes – Although monitoring will be required to determine site specific nutrient removal the Framework Approach for Responding to Wetland Mitigation Proposal prepared for Natural England by The Rivers Trust and Constructed Wetlands Association (Johnson <i>et al.</i> , 2022) provides evidence and notes nutrient removal accords to confidence in design.
Wider environmental considerations	<p>Environmental considerations should include:</p> <ul style="list-style-type: none"> ▪ Relatively flat topography ▪ Soils (including nutrient content), geology and hydrogeology (including groundwater level change) ▪ Hydrology and flood risk ▪ Infrastructure ▪ Nature, landscape, and archaeological conservation
Evidence of effectiveness	There is a large body of literature that provides evidence of the effectiveness of CWs for nutrient removal, which is supported by the recently release of Natural England's wetlands framework which is expressly aimed at supporting the development of wetlands for nutrient mitigation.
Precautionary	A feasibility assessment may show that a proposed wetland is not deliverable due to one or more of the environmental conditions not being met, i.e., topography does not support a wetland draining under gravity and/or flood risk.
Securable in perpetuity	It is anticipated that this solution will be suitable for the lifetime of the development. Land that is suited to wetlands is very unlikely to revert to any other land use.
Cost estimate	<p>Cooper <i>et al.</i>, (2020): Capital costs for a 1.1ha wetland reported as:</p> <ul style="list-style-type: none"> ▪ Planning, design & management £15,000 ▪ Construction £161,000 ▪ Wetland planting £18,000 ▪ Total cost £194,000 <p>Total cost of the scheme suggested to be £500,000, which is assumed to include maintenance and monitoring</p> <p>Cooper <i>et al.</i>, (2020): Capital costs for a 0.3ha wetland reported as:</p> <ul style="list-style-type: none"> ▪ Planning, design & management £1,305 ▪ Construction £21,712 ▪ Wetland planting £7,004 ▪ Total cost £30,021 <p>Note that the land for this site was donated</p>

Descriptor	Definition
	Through consultation with various stakeholders and Local Authorities delivering similar schemes, a value of £300,000/ha is a reasonable cost for wetlands. This accounts for land purchase, design & permitting fees, construction, monitoring, ongoing maintenance, administration and contingency.

There are various types of CW, which are described in **Table 3.7**. However, Integrated Constructed Wetlands (ICW) can deliver the greatest number of additional benefits compared with other wetland types (Harrington & McInnes, 2009). In line with Natural England wetland framework (Johnson *et al.*, 2022), wetlands should be appropriately designed and maintained.

Land *et al.*, (2016) summarised the results of 93 studies of 203 wetlands predominantly treating agricultural sources of water. They concluded CWs have moderate removal efficiencies for TP at 46% (95% confidence interval of 37-55%).

A review of wetlands treating effluent from Water Recycling Centres (WRC) in Ireland concluded that ICWs performed best out of all types of CWs and where ICWs were well designed under rigorous guidance, they outperformed mechanical treatment for P (Hickey *et al.*, 2018). A follow up study assessing the performance of the Glaslough wetland for Total Phosphate (TP) removal after four-years of operation showed a TP removal efficiency of 93.5% (Dzakpasu *et al.*, 2015).

Well designed CWs that continue to receive high nutrient input loads can sustain high nutrient removal efficiencies. A study of 12 ICWs treating livestock wastewater found that these wetlands averaged soluble reactive phosphorus (SRP) removal efficiencies of > 80% over an eight-year period, with 11 of the 12 averaging removal efficiencies > 90%.

Recent studies have also been published for ICWs treating final effluent from two Anglian Water Services (AWS) WRCs in Norfolk, both of which are in Norfolk. In 2014, the Norfolk Rivers Trust (NRT) deployed an ICW to treat final effluent discharge from the Northrepps WRC. Analysis of monitoring data from the first 18 months of operation at this wetland reported high nutrient removal efficiencies, with TP concentrations reduced by 78%.

Table 3.7: Types of constructed wetland used for the treatment of polluted water sources (after Dotro *et al.*, 2017; Hickey *et al.*, 2018)

Type	Description
Horizontal Subsurface Flow (HF)	<ul style="list-style-type: none"> Influent water flows horizontally through a sand- or gravel-based filter Water is kept below the wetlands surface Plants (emergent macrophytes²) grow in the filter media³ and help to promote nutrient removal processes Filter media is mainly saturated, with anaerobic (oxygen-free) conditions dominating nutrient removal processes
Vertical Subsurface Flow (VF)	<ul style="list-style-type: none"> Influent water is pumped intermittently onto a filter and percolates vertically through the filter Between pumping of water, air re-enters the filter and aerobic (oxygen-rich) conditions dominate Emergent macrophytes are grown at the surface of the wetland
Hybrid wetlands	<ul style="list-style-type: none"> Combine HF and VF wetland types

² A plant that has adapted to live in an aquatic (water) environment, both freshwater and saltwater. The term macrophyte is used to distinguish them from algae and other microphytes.

³ A type of filter that uses a bed of sand, peat or man-made materials such as tyres, foam, crushed glass, or geotextile membranes to filter water for drinking aquaculture or other purposes to improve water quality.

Type	Description
	<ul style="list-style-type: none"> Most commonly a VF compartment is followed by an HF compartment
Free water surface (FWS)	<ul style="list-style-type: none"> Resemble natural wetlands, with shallow water and emergent macrophytes FWS can either be engineered rectangular waterbodies or can be designed to fit in with landscape and termed ICWs Water is retained for longer in FWS (longer hydraulic residence time (HRT)) than in other types of wetlands

3.3.1.5 Willow buffers

Willow buffers consist of short-rotation willow coppice irrigated with wastewater from a development and removes a significant amount of P from the wastewater before it enters the watercourse. **Table 3.8** provides an overview of willow buffers as a solution.

Table 3.8: Key considerations of willow buffers

Descriptor	Definition
Description of solution	<p>Short-rotation willow coppice can be used to treat wastewater by providing vegetation filter strips irrigated with wastewater to remove P from the wastewater, whilst producing woody biomass for energy purposes through a coppicing cycle (2-5 years, though commonly every 3 years).</p> <p>The irrigation system will not completely eliminate wastewater pollution as some wastewater by run off or percolate into groundwater. As a result, timing and irrigation rates must be considered.</p> <p>Evapotranspirative willow systems have zero discharge and are an alternative to irrigated systems and are typically used to treat domestic wastewater from small settlements or individual households. All influent wastewater and precipitation are evapotranspired on an annual basis with proper design. They do not require skilled personnel for operation or maintenance.</p>
Delivery timescale	Willow buffers are unlikely to require extensive infrastructure, planning permission or environmental permits, and can therefore be delivered in the short term. The rapid growth rate of willows means that a functional solution could be delivered more rapidly than a traditional wet woodland.
Duration of operation	Willow buffers could potentially be operational over long timescales. Because they need to be regularly managed to maintain effectiveness and trees need to be periodically replaced, willow buffers are considered impermanent features.
Nutrient removal	<p>TP removal potential: 70% long-term.</p> <p>Short-rotation willow coppice filter strips achieve TP removal rates of 67-74% (Larsson <i>et al.</i>, 2003; Perttu, 1994), although initial reduction rates are often closer to 95%. Lachapelle <i>et al.</i>, (2019) suggested a significant increase in available P in the soil, suggesting the soil can become saturated over time.</p> <p>For evapotranspirative willow systems, wastewater is constantly applied and stored as an elevated water level.</p> <p>P accumulation results in a P rich substrate which can be reused as fertiliser. More P is stored in the soil, roots, and leaves of the willows than in the woody biomass (Istencic and Bozic, 2021).</p> <p>The recommended TP application to prevent saturation of soils is 24 kg/ha/yr (Caslin <i>et al.</i>, 2015), which is typically a lesser volume than that applied directly from domestic wastewater. This solution could be used as a form of secondary treatment after domestic PTPs.</p>
Applicability	Willow buffers are applicable to the Lambourn catchment as the rural land which dominates the landscape allows this to be a feasible option.
Management and maintenance	Harvesting of willow would be required every three to five years and replanting every 20-25 years. This solution typically sees a 30% increase in biomass yield (Buonocore <i>et al.</i> , 2012).
Additional benefits	There are additional benefits of improved water quality and a BNG due to improved habitat.

Descriptor	Definition
Best available evidence	No – monitoring will be required to determine nutrient removal.
Wider environmental considerations	The transport of biomass to energy production plants, and implications of waste disposal from the energy plant output must be considered as this may have adverse impacts on the wider environment.
Evidence of effectiveness	No - there is limited evidence to determine the efficacy of such a scheme. Although the solution is likely to be effective beyond reasonable scientific doubt. There is the potential for P saturation within soils and monitoring should be used to evidence the effectiveness.
Precautionary	Yes – a precautionary approach can be applied to this solution until and after site specific information becomes available.
Securable in perpetuity	Yes – it is anticipated that this solution will be suitable for the lifetime of the development, though the harvest cycle may lead to variance in uptake.
Cost estimate	<p>The cost for establishment is typically £2,500/ha. Operational costs including ploughing and cultivation and are likely to £200 - £300/ha/yr.</p> <p>Potential returns vary hugely depending on many variables including price received for crop and drying requirements.</p> <p>Rising energy costs of oil and gas may provide greater future opportunities for willow chips as a fuel source.</p>

3.3.1.6 Beetle banks

Beetle banks are densely grassed mound constructed on agricultural land to control runoff. **Figure 3.5** depicts an example beetle bank, and **Table 3.9** provides an overview of them as a solution.



Figure 3.5: Photograph of a beetle bank (Source: Walsh, 2016)

Table 3.9: Key considerations of beetle banks

Descriptor	Definition
Description of solution	A beetle bank is a densely grassed mound approximately 3m to 5m wide and a least 0.4 m high constructed on agricultural land to control runoff.

Descriptor	Definition
	Beetle banks can be planted across slopes or along natural drainage ways to minimise runoff and soil erosion. They present a similar scenario to a riparian buffer strip (Section 3.3.1.1). There is also unlikely to be a high uptake amongst farmers because they need to be positioned in more productive areas in the centre of fields rather than in the margins.
Delivery timescale	Beetle banks do not require extensive infrastructure, planning permission or environmental permits, and can therefore be delivered in the short term.
Duration of operation	Once installed and established beetle banks are anticipated to be a permanent feature.
Nutrient removal	Nutrient removal rates are unknown, but likely to be similar to Riparian Buffer strips. Calculations have not been undertaken to determine the level of P removal. An assumption is made that P is removed via both the removal of small areas of farmland which would ordinarily be subject to application of P containing fertilisers, and the uptake of P via the tussock grass on the bank.
Applicability	The agricultural nature of the catchment means this could offer plausible, although possibly small-scale, solutions. The location of beetle bank installation may be limited by parameters such as soil type, which should be suitable to form a free-draining raised bank.
Management and maintenance	The earth ridge size, measuring between 3m to 5m wide and at least 0.4m high, should be maintained. The grass should be cut several times in the first year to help it establish. Once a tussocky grass mixture has been established (1 year post construction) annual grass cutting should occur. This should take place after 1 st August to protect nesting invertebrates and control woody growth and suckering species. The upper bank area should be dry and therefore constructed of free-draining soils to allow insects to hibernate securely.
Additional benefits	Beetle banks provide a BNG in the form of nesting and foraging habitats for pollinators, small mammals, some farmland birds and beneficial insects which feed on crop pests. To achieve wider environmental benefits beetle banks do not require the application of fertilisers, manured and/ or lime and pesticides (except herbicides used to weed-wipe or spot-treat control of injurious weeds, invasive non-natives, nettles or bracken). Beetle banks can help to slow down, reduce or stop soil erosion.
Best available evidence	No - As there have been no calculations to determine the level of P removal, evidence cannot be drawn upon.
Wider environmental considerations	Earthworks and associated machinery fuel and transport must be considered as they may have detrimental environmental impacts. Grass cut during maintenance must be removed from the area to remove nutrients, likely incurring fuel and carbon usage. Best practice beetle bank construction is designed in order to achieve wider environmental benefits.
Evidence of effectiveness	No - Significant monitoring is likely to be required as there is a high level of uncertainty as to the P removal rates.
Precautionary	Not possible to determine at this stage.
Securable in perpetuity	There are many site-specific location parameters required to deliver a successful beetle bank scheme. There is a high level of uncertainty of success. Monitoring for Countryside Stewardship grant could act as a mechanism for securing obligations; however, this is not a firm legally binding enforceable agreement. Therefore, the scheme is not currently securable in perpetuity.
Cost estimate	Costs are assumed to be as provided for riparian buffer strips.

3.3.1.7 Beaver reintroduction

The Eurasian beaver (*Castor fiber*) was once common in UK riverscapes but has been largely extirpated across the UK and Europe. Beavers are recognised as ecosystem engineers and ‘keystone species’ that can have a disproportionate impact on the hydrology, geomorphology, water quality and aquatic ecology of rivers (**Figure 3.6**) (Brazier *et al.*, 2021). As such, there is now an increased interest in conservation strategies that include beaver reintroduction as part of wider river restoration and catchment management strategies.

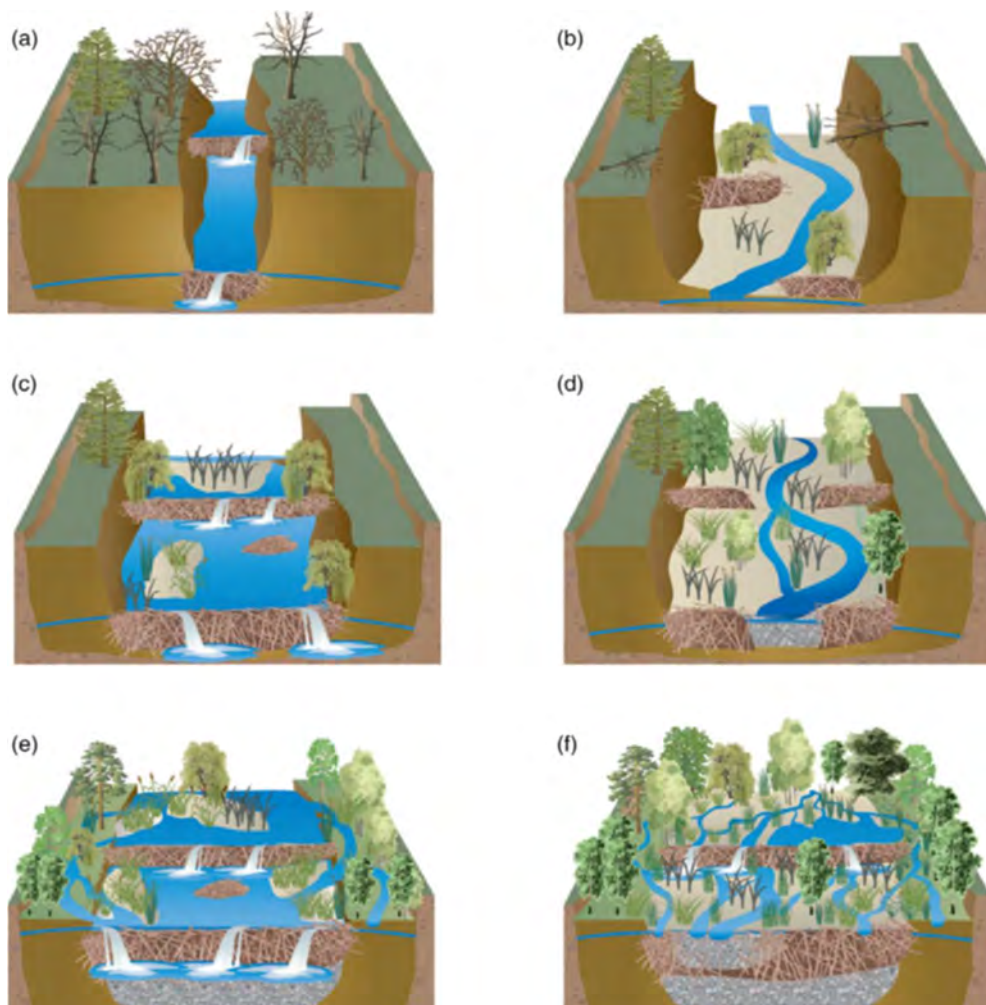


Figure 3.6 Conceptualisation of the geomorphic changes beaver damming can have on incised streams:

- a) beavers dam an over-deep and straightened river channel;
 - b) channel widening and greater sediment mobilisation reconfigures the channel with vegetation establishment within new marginal channel areas;
 - c) a wider channel reduced high flow peaks, enabling more stable dams to be built;
 - d) vegetation establishment and sediment accumulation combined with small dam ‘blowout’ establishes a system of ponds;
 - e) process repeated with more dam building, channel widening resulting in an increase in water table height that reconnects the river to its floodplain;
 - f) further establishment of vegetation communities and sediment deposition results in a multi-thread channel with an increase in pond areas and areas of reduced flow that provide wetlands habitats.
- (Source: Brazier *et al.*, 2021).

The damming of streams by beavers results in the creation of ponds behind the dams that allow for increased sediment deposition. These ponds can facilitate a set of linked processes that together can remove or retain P within the beaver pond complexes. Because the nutrient removal processes that are associated with beaver impacts on rivers require beavers to construct and maintain large dam and pond complexes, they cannot be relied upon to deliver nutrient removal in perpetuity.

Engineered logjams have the potential to support the same set of processes that remove nutrients as in beaver dam and pond complexes but are not supported by a large body of academic research for water quality impact as most research focusses on flood risk management. Because engineered logjams have a greater ability to be managed and maintained in the long-term, the sections below will consider them as an alternative practical solution to beaver reintroduction as a nutrient mitigation option.

Key considerations for beaver reintroduction are summarised in **Table 3.10**.

Table 3.10: Key considerations of beaver reintroduction

Descriptor	Definition
Description of solution	The Eurasian beaver was once common in UK and are recognised as ecosystem engineers and a 'keystone species' that can have a disproportionate impact on the hydrology, geomorphology, water quality and aquatic ecology of rivers. Their damming of streams results in the creation of ponds behind the dams, which can remove or retain P due to physical and chemical processes. As such, there is now an increased interest in conservation strategies that include beaver reintroduction as part of wider river restoration and catchment management strategies.
Delivery timescale	For beaver reintroduction schemes, likely between 4.5-6 years. Logjam schemes could be delivered in six to nine months
Duration of operation	Beaver reintroduction schemes are unlikely to last in perpetuity. Logjams with appropriate maintenance may provide long-term, in perpetuity nutrient mitigation
Nutrient removal	TP removal potential: Variable, with some studies reporting P sources from beaver ponds while UK and European studies reporting P removal efficiencies between 20%-80%. Most studies also report SRP and not TP UK and European studies reporting P removal efficiencies between 4%-60%.
Applicability	NA
Management and maintenance	Beaver reintroduction requires little management and maintenance. Logjams require maintenance to repair dams should they become damaged by high flows
Additional benefits	NFM, biodiversity and amenity benefits
Best available evidence	Yes, but evidence is more limited for UK applications
Wider environmental considerations	The following environmental considerations and assessments may be required for deploying beaver/ logjam schemes: <ul style="list-style-type: none"> ▪ FRA – for flood risk; ▪ WFD – for potential impacts on WFD status of a protected water body; ▪ HRA – for potential impacts on Habitats Sites; and ▪ Engagement with landowners and managers to tackle perception issues
Evidence of effectiveness	Yes, but only if assuming very precautionary estimates of N and P removal
Precautionary	Yes
Securable in perpetuity	Beaver reintroductions – no, engineered logjams – yes
Cost estimation	No reliable estimate for beaver reintroduction

Descriptor	Definition
	Engineered logjams in the range of £5,000-25,000, not including land purchase if required

Nutrient removal

Recent reviews of the impact of beavers on river systems presents contrasting evidence on the impact of beaver impacts on P removal. In a meta-analysis of studies from across North America and Eurasia, Ecke *et al.*, (2017) suggest that beaver have a little impact on P removal in streams.

Brazier *et al.*, (2021) detail how beaver impacts cause changes to hydrology and geomorphology that are linked to nutrient removal. They cite numerous studies that have provided evidence of P removal in rivers because of beaver activities and discuss the concept of 'beaver meadows': an end state of beaver damming where infilling of beaver ponds by sediment and then progressive vegetation growth results in an altered landscape akin to that shown in **Figure 3.6**. Progression to beaver meadows is likely to result in more sustained P removal.

The processes that retain P within beaver dam and pond complexes are predominantly related to P deposition that is attached to sediments. Some adsorption of P to sediments occurs in beaver ponds due to exchange of surface water with subsurface flow pathways in pond sediments, however where subsurface flow pathways encounter anaerobic conditions, this can also result in the release of P that is bound to sediments and has been hypothesised as the reason for inconsistent results for SRP removal by beaver activities (Larsen *et al.*, 2021).

Table 3.11 collates key information from relevant studies and highlights that each study recorded P reductions resulting from beaver activities, with a wide range of reductions recorded across the different study sites.

Table 3.11: Results from studies of beaver impacts on phosphorous in rivers in the UK and Europe

Study	Location	Study length	Upstream to downstream Nutrient concentration reductions - P	Accounted for seasonality?
Puttock <i>et al.</i> , (2017)	Devon, UK	1 year	80% PO ₄ reduction	Yes
Law <i>et al.</i> , (2016)	Blairgowrie, Scotland	1 year	25% PO ₄ reduction	Yes
Smith <i>et al.</i> , (2020)	Brandenburg, Germany	1 year	46% PO ₄ reduction and 13% TP reduction	Yes
Čiuldiene <i>et al.</i> , (2020)	Northwest Lithuania	< 1 year	20% TP reduction	No

Research has shown that beaver impacts on streams can result in the removal of P, including in a UK context, but this removal is not always consistent and removal efficiencies may not be that high.

It is noted that there is very limited research on the impact of logjams on nutrient dynamics in rivers. However, if a series of logjams was designed that created a similar ponding effect to that created by beavers where they dam rivers, the same nutrient removal processes could potentially be created at similar removal efficiencies.

Engineered logjams can be deployed in a complex of dams in one go, which may help a logjam scheme to reach peak nutrient removal efficiency faster than a beaver reintroduction scheme. It is likely that a logjam scheme would take six to nine months to deliver, allowing for site assessments, surveys, design, land acquisition and deployment.

3.3.2 Runoff management systems

3.3.2.1 Taking land out of agricultural use

Taking land out of agricultural use involves replacing high nutrient exporting agricultural land with low nutrient exporting land. **Table 3.12** provides an overview of taking land out of agricultural use as a solution.

Table 3.12: Key considerations of taking land out of agricultural use

Descriptor	Definition
Description of solution	<p>Land taken out of agricultural use is replaced with low exporting land such as semi-natural grassland, woodland, or energy crops, e.g., willow or <i>Miscanthus</i>. Vegetation such as this actively uptakes nutrients and limits the impact of legacy P (build-up of P in soil caused by repeated applications of fertilizers and animal waste). Reversion of previously agricultural land to a more natural state will eventually reduce P leaching to natural background rates.</p> <p>Woodland planting can accelerate the transition to background P concentrations. Natural England suggest that woodland planting is a viable mitigation method that can be easily implemented. There is a minimum requirement for 20% canopy cover at maturity, which is equivalent to approximately 100 trees/ha.</p> <p>Maintenance of woodland is easy to verify and well established. Native tree species would be the preferred choice, although climate resilience may require the use of non-native species to account for long-term climate change effects.</p> <p>Though most P is sediment bound, it is worth noting energy crops (e.g., <i>Miscanthus</i> and willow) are considered to have a higher soluble nutrient uptake than woodland. <i>Miscanthus</i> is also ideally suited to marginal land that provides little value for generating income, as it can be grown for biofuel.</p> <p>However, energy crops provide a lower biodiversity benefit and would be unable to retrieve as much income through potential monetised biodiversity schemes as more natural planting would.</p> <p>Other measures to accelerate the transition to P background levels include the ploughing of previously agricultural land, suggested by Sharpley (2003) and Dodd <i>et al.</i>, (2014) to decrease nutrient concentrations by half and therefore reduce P surface runoff losses.</p>
Delivery timescale	Taking agricultural land out of use can be implemented over short-term timescales. Identification of suitable land, willing landowners and agreeing terms are likely to be the most time-consuming tasks in the implementation process of this solution.
Duration of operation	<p>This solution could potentially be implemented over a temporary, impermanent and permanent timescale.</p> <ul style="list-style-type: none"> Temporary: Land taken out of production but otherwise unchanged Impermanent: A longer-term reversion from agriculture Permanent: It could be maintained in perpetuity if the land use is changed so that it is used for non-agricultural purposes (i.e., woodland, <i>Miscanthus</i> etc.)
Nutrient removal	<p>The P reduction calculations assume that farms will be operating according to best practice and not polluting. This will also ensure that mitigation schemes do not compromise the ability to deliver long term Water Framework Directive (WFD) targets.</p> <p>Average TP removal potential:</p> <p>Upper Lambourn: 0.07 kg/ha/yr</p> <p>Lower Lambourn: 0.36 kg/ha/yr</p> <p>Nutrient removal rates for all land use types as provided in</p> <p>Table 3.13.</p>
Applicability	Unlikely to be applicable to indoor pig or poultry farms - other methods of calculating nutrient removal
Management and maintenance	For <i>Miscanthus</i> , fertiliser application is not needed to be added until it is established (after one to two years) and less needs to be applied than most farming practices. Harvesting needs to be completed every two to four years.

Descriptor	Definition
Additional benefits	<ul style="list-style-type: none"> Energy crops can be used for coppice BNG potential Soil erosion which can lead to nutrient mobilisation is also likely to decrease with time as soil is stabilised by more continuous vegetation cover.
Best available evidence	This solution uses the best available scientific evidence. However, some doubt may remain over legacy P concentrations and may require further research or monitoring to gain a better understanding.
Wider environmental considerations	There is the potential for long term inflated agricultural land prices if this solution requires land to be out of agricultural use for more than one to two years.
Deliverability & certainty	<p>Certainty regarding cessation of arable farming can be easily secured and verified using aerial imagery and site visits. Where grazing land is taken out of use, in order for there to be an actual reduction in nutrient loads, then it is assumed that livestock numbers would also need to be decreased and the livestock/ hectare rate maintained. However, it is assumed that farms typically operate close to optimal stocking densities and livestock reductions would be needed to maintain this.</p> <p>Where this solution is used as a temporary measure, livestock can be temporarily located outside of the catchment. However, changes to grazing practices and stocking densities are more difficult to monitor and enforce in comparison to arable reversion to woodland or energy crops, and therefore provide a lower degree of certainty.</p> <p>Furthermore, consideration would need to be given where potentially polluting agricultural activity is moved to another location where the land parcel is smaller and could increase the pollution risk.</p>
Evidence of effectiveness	<p>Yes – beyond reasonable scientific doubt.</p> <p>Taking land out of agricultural use has an immediate impact on its P output, as the desisting of fertiliser application reduces surface water P levels following rainfall events. However, some legacy P will be maintained in the soil. The time taken for soils to reduce to agronomic targets and background concentrations varies depending on soil types and P concentrations (Dodd <i>et al.</i>, 2012).</p> <p>A study by McCollum (1991) indicated that P levels may not be reduced to background concentrations for at least 17 years, based on fine sandy loamy soils in arable production in the United States. Much of the soil surrounding the Lambourn is loamy.</p> <p>Gatiboni <i>et al.</i>, (2021) found that the median time to reach agronomic targets was <1 year but could take as long as 11 years. However, the time taken to reach environmental targets purely by cessation of phosphorus fertiliser would be 26 – 55 years.</p>
Precautionary	Yes – a precautionary approach can be applied to this solution until and after site specific information becomes available.
Securable in perpetuity	<p>Yes – However, it is unlikely this solution would be used in the long term.</p> <p>Plantations may need to prove they can be in place for the lifetime of the development or offer a fallback option with an equivalent P removal.</p>
Cost estimate	<p>The average Farm Business Tenancy (FBT) rental price in the southeast of England for farms in 2021 was £217/ha</p> <p>The average purchase price in the Berkshire of England for arable farms is £25,550/ha and for livestock farms is £19,163/ha (Farmers Weekly, 2024).</p> <p>Energy Crop Schemes that provide establishment grants for approved energy crops are available.</p>

Table 3.13: TP mitigation per land use type

Original farm type	New land use type	Phosphorus mitigation (Kg TP/ha/yr)	
		Upper Lambourn	Lower Lambourn
Dairy	Meadows or Woodland or Grassland or Orchards	0.11	0.75
Lowland grazing		0.05	0.06
Mixed livestock		0.09	0.49
Poultry		0.11	0.27
Pig		0.10	0.57
Horticulture		0.08	0.44
Cereals		0.10	0.30
General arable		0.07	0.36
Allotment		0.38	0.18

3.3.2.2 Conversion of agricultural land to solar farms

Converting agricultural land to solar farms works in a similar way to taking land out of agricultural use, in that high nutrient exporting land use is replaced with low nutrient exporting land use. Land converted to solar farms may need light maintenance (**Figure 3.7**).

Table 3.14 provides an overview of converting agricultural land to solar farms as a solution.



Figure 3.7: Land that has been converted to a solar farm being maintained (Source: Tugwellcontracting.com)

Table 3.14: Key considerations of the conversion of agricultural land to solar farms

Descriptor	Definition
Description of solution	<p>A solar farm is a renewable energy installation with many solar panels which generate electricity. Solar farm installation can reduce the P export of the land by:</p> <ul style="list-style-type: none"> ▪ a reduction in number of grazing livestock and therefore P manure in livestock output by either reducing the density of grazing animal or removal of livestock from agricultural land; and ▪ removal of agricultural land usage and therefore removal of nutrient inputs from fertiliser or waste applied to land from agricultural benefit to enhance crop growth. <p>Land can be taken completely out of agricultural use and replaced with solar farms, or agricultural use can mostly cease, both agricultural land and solar farm usage with reduced livestock density continuing to manage vegetation and continue to provide some cost benefit.</p>
Delivery timescale	<p>An estimated timeframe of less than five years is required to gain approval and install a solar farm. Solar farms are a less intensive land use than typical agricultural operations and produce significantly fewer nutrients.</p> <p>Therefore, solar farms have a lower environmental and nutrient impact, meaning existing or imminent solar farms could be used for nutrient mitigation in the short-term.</p>
Duration of operation	<p>A solar farm is estimated to operate for approx. 40 years, and the change of land use is therefore considered to be permanent. However, it is important to note that operation and maintenance costs could potentially exceed the cost for renewal of the solar farm after 40 years.</p> <p>As such, the solution may not reach the threshold to be classified as 'securable in perpetuity' (80-125 years) unless a longer-term agreement between the operator and landowner is in place, e.g., to replace photovoltaic cells with new infrastructure at the end of their economic lifespan.</p>
Nutrient removal	<p>P is removed or reduced according to the cessation of usage of land as agricultural land or reduction correlated with reduction of grazing animal density.</p> <p>The Calculator has been used to estimate the effectiveness of this solution. These calculations would need to be refined using Farmscoper Tool and site-specific information input related to fertiliser type and/ or manure application.</p> <p>The initial calculations undertaken provide the following ranges:</p> <ul style="list-style-type: none"> ▪ Upper Lambourn: 0.05 – 0.38 kg/ha/yr ▪ Lower Lambourn: 0.06 – 0.75 kg/ha/yr
Applicability	<p>Solar farm installation is applicable to areas of West Berkshire where there is available agricultural land which can be used, available connections to the National Grid and planning applications have been received for such schemes within West Berkshire.</p> <p>Some key considerations when proposing a solar farm installation in West Berkshire are that some areas are heavily designated and protected, such as the North Wessex Downs Area of Outstanding Natural Beauty, and primarily include visual impacts on the landscape and/ or character of the area, and heritage assets. A farm would need to be located and designed so it does not have an unacceptable impact on these receptors.</p>
Management and maintenance	<p>Once land is no longer in agricultural use, further land management and maintenance is not anticipated. Should land be retained as both agricultural land and solar farm usage with reduced livestock density, it will be necessary to monitor livestock numbers. It may be necessary to determine a threshold number for specific grazing animal species and monitor in order to keep the number below the threshold.</p> <p>If the land is not kept in agricultural use, occasional cutting of vegetation may be necessary to avoid shading of the solar panels. The solar arrays will also require maintenance to ensure that they remain operational and are working efficiency.</p>
Additional benefits	<ul style="list-style-type: none"> ▪ Renewable energy provision ▪ BNG potential ▪ Water quality ▪ Affordable and feasible

Descriptor	Definition
Deliverability & certainty	To be considered as a viable solution and follow distinctions made in the 'Dutch N' case, nutrient neutrality must be one of the key aims of the solar farm. Natural England's position is that if the primary purpose of scheme is for power generation for example, with the unintended consequence of providing mitigation, the scheme may not be considered as acceptable nutrient mitigation. Additionally, a proposed solar farm will require planning permission. Any proposed development identified at the planning stage to potentially have adverse effects on the integrity of a site's habitat (e.g., the proposed mitigation is not specifically for the purpose of nutrient mitigation) may not be considered acceptable 'in principle' as a mitigation measure compliant with the Habitats Regulations 2017.
Best available evidence	This solution uses the best available scientific evidence. However, some doubt may remain over legacy P concentrations and may require further research or monitoring to gain a better understanding.
Wider environmental considerations	The construction cost of the solar farm infrastructure can cause pollution, environmental degradation and pressure on natural resources in other areas or countries. Solar farms should ideally be installed on brownfield land, which can be difficult to repurpose.
Evidence of effectiveness	Indicative calculations which have not been subject to review have been undertaken using The Calculator using available data and the evidence indicates this can be an effective solution. The effectiveness of removing land from agricultural production is provided in Section 3.3.2.1 .
Precautionary	Yes – a precautionary approach can be applied to this solution until and after site specific information becomes available.
Securable in perpetuity	Yes - the lifetime of such a scheme can be estimated as approximately 40 years. Complete conversion from agricultural land to solar farm is the most viable and certain solution. There is potential for the lease and planning permission as a mechanism to secure a legally enforceable scheme.
Cost estimate	Land rental or lease costs and construction costs can be offset against energy sale price.

3.3.2.3 Cessation of fertiliser and manure application

Where full land abandonment is not available, a change of farming practices or cessation of fertiliser application may be applicable. **Table 3.15** provides an overview of cessation of fertiliser and manure application as a solution.

Table 3.15: Key considerations of the cessation of fertiliser and manure application

Descriptor	Definition
Description of solution	A change of farming practices or cessation of fertiliser will have an immediate short-term impact by reducing the small amount of soluble P runoff lost following application, particularly during rainfall events. There will also be a longer-term impact on particulate P loss should the solution be implemented for consecutive years due to a reduction in soil P reserves. Particulate forms of P are typically lost through soil erosion when P is bound to soil. Legacy P could potentially be a source of fertiliser for use on crops and could decrease the dependence on external fertilisers. An alternative option to ceasing fertiliser application would be to apply the correct level of fertiliser, rather than applying a constant amount. However, the P removal is more variable, and the release of credits would only be available following soil sampling.
Delivery timescale	This solution does not require any investment in infrastructure, planning permission or environmental permits. It can therefore be implemented in very short timescales. This solution will go above and beyond the requirements for catchments within nitrate vulnerable zones.
Duration of operation	This solution is envisaged as a temporary measure for use while longer-term solutions are developed and implemented. Prolonged cessation of fertiliser application may produce similar results as taking land out of agricultural use (Section 3.3.2.1).
Nutrient removal	Cessation of fertiliser allows land to continue to be farmed whilst still providing P reductions, with the loss of productivity from the lack of fertilisation balanced by income from nutrient mitigation.

Descriptor	Definition
	<p>P levels can be reduced through cutting for silage without fertiliser which would prevent the application of approximately 30 kg/ha of P (Agriculture and Horticulture Development Board, 2022). Particulate P runoff reductions from the cessation of 100% of fertiliser application is estimated to be 50% (Newell Price <i>et al.</i>, 2011).</p> <p>White and Hammond (2009) found that particulate P accounts for 40% of the TP loss from improved grassland. However, on arable land particulate forms of phosphorus typically have more of an influence than on grassland areas, due to the lack of dense vegetation preventing particulate loss. Neal <i>et al.</i>, (2010) found that particulate P in agricultural and rural settings in the UK made up 50% TP.</p> <p>TP mitigation rates (Kg/ha/yr) are provided in Table 3.16.</p>
Applicability	This solution is applicable to all types of arable agriculture where natural or synthetic fertilisers are applied.
Management and maintenance	Monitoring will be required to ensure that estimated nutrient removal rates are achieved and validate that fertiliser/ manure application has ceased. This is likely to comprise initially of one to two visits per year, including an initial round of sampling to establish the baseline conditions.
Additional benefits	Land could be selected strategically to help buffer from other pollution sources, e.g., suspended sediment.
Best available evidence	Yes – monitoring likely to be needed to confirm.
Wider environmental considerations	If the solution is widely implemented, then the reduced yield could result in food supply issues, but to a lesser degree than taking land out of agricultural use.
Evidence of effectiveness	<p>Yes – beyond reasonable scientific doubt.</p> <p>The cessation of fertiliser and manure has an immediate impact on the land's P output, reducing surface water P levels following rainfall events.</p> <p>As with the taking land out of agricultural use solution, some legacy P will be maintained in the soil. McCollum (1991) indicated that P levels may not be reduced to background concentrations for at least 17 years.</p>
Precautionary	Yes – a precautionary approach can be applied to this solution until and after site specific information becomes available.
Securable in perpetuity	<p>No – likely to be utilised as a bridging solution.</p> <p>Cessation of fertiliser allows land to continue to be farmed whilst still providing P reductions, with the loss of productivity from the lack of fertilisation balanced by income from nutrient mitigation. This could be secured as a short-term bridging solution by planning conditions.</p> <p>Legal agreements to cease fertiliser application for a set area and duration will be required and spot checks undertaken to monitor farming practices and nutrient concentrations in runoff.</p>
Cost estimate	Cessation of fertiliser application to arable land is estimated to have a 50% reduction in yield on the affected area. Similarly, cessation to grassland is assumed to have a reduction of 30% to an average yield of 8 t/ha (Newell Price <i>et al.</i> , 2011). The actual costs per farm are likely to differ due to the variety of variables, such as fertilisation rates, soil types, crop types, etc. An estimated cost breakdown is provided in Table 3.17 .

Table 3.16: Cessation of fertiliser mitigation rates

Farm type	Phosphorus mitigation (Kg TP/ha/yr)	
	Upper Lambourn	Lower Lambourn
Dairy	0.03	0.19
Lowland grazing	0.02	0.02
Mixed livestock	0.03	0.13
Poultry	0.03	0.07

Farm type	Phosphorus mitigation (Kg TP/ha/yr)	
	Upper Lambourn	Lower Lambourn
Pig	0.03	0.15
Horticulture	0.03	0.12
Cereals	0.03	0.08
General arable	0.02	0.10
Allotment	0.10	0.05

Table 3.17: Cessation of fertiliser/ manure cost estimation

Description	Cost (£/ha/yr)	
	Arable	Grassland
Saving in fertiliser	-100.82	-35.96
Reduced use of fertiliser spreaders	-6.65	-6.65
Reduced yield / forage replacement	781.86	311.12
Soil testing	600	600
Total	1,274.39	868.51

3.3.2.4 Cover crops

Cover crops can be implemented on bare soils, particularly steeper slopes, to intercept and uptake P present in surface water runoff before it reaches the watercourse. **Table 3.18** provides an overview of cover crops as a solution.

Table 3.18: Key considerations of cover crops

Descriptor	Definition
Description of solution	<p>Surface runoff and erosion represents a principal mechanism for nutrient loss from many agricultural systems. The risk of runoff is primarily controlled by timing, rate and method of fertiliser or manure application, as well as post-application rainfall. Natural factors such as slope, surface roughness, infiltration capacity and magnitude of erosion also have a strong control.</p> <p>Bare soils are very prone to erosion and cover crops help maintain soil cover during the autumn and winter or any time of the year including drier months and cover crops can also be sown in springtime.</p> <p>They are especially useful to mitigate erosion on high-risk sloping land. Cover crops act to encourage infiltration and reduce overland flow velocity. They are best employed when land would otherwise be left bare during the crop rotation process.</p> <p>They are typically used either prior to main production cycle, e.g., potatoes, sugar beet, or post-harvest, e.g., cereals.</p> <p>Validation of cover crops can be achieved through satellite imagery, photographs, and drive by visits. Due to some uncertainty in removal values, soil sampling and monitoring may be required to establish the baseline and P reduction.</p>
Delivery timescale	This solution does not require any investment in infrastructure, planning permission or environmental permits. It can therefore be implemented in short timescales.
Duration of operation	This solution is envisaged as a long-term change in agricultural land management practices. However, in the absence of any significant infrastructure, long term investment, or mechanisms for binding agreements with landowners, it is considered to be impermanent.

Descriptor	Definition
Nutrient removal	<p>Published P reduction rates are variable within the literature. Novotny and Olem (1994) suggest significant P removal rates of 30-50%, with others (Sharpley and Smith, 1991) finding an average reduction of 77% across four studies.</p> <p>However, another investigation concluded that changes to P losses were not significant (Kleinman <i>et al.</i>, 2005). Similarly, Cooper <i>et al.</i> (2017) found that oilseed radish crops had no effect on P losses.</p> <p>Overall, there is a vast amount of uncertainty and removal rates are assumed to be ~30%, which equates to winter cover cropping removal rates:</p> <ul style="list-style-type: none"> Upper Lambourn: 0.07 kg/ha/yr; and Lower Lambourn: 0.36 kg/ha/yr. <p>There is also the possibility to use summer cover cropping for further nutrient removal.</p>
Applicability	This solution is applicable to all types of arable agriculture, particularly where fields are left bare and thus vulnerable to surface water runoff and erosion after the harvest of the main crop.
Management and maintenance	There will be annual maintenance requirements associated with preparation, planting, destruction, and cultivation of cover crops.
Additional benefits	<ul style="list-style-type: none"> Reduced soil erosion Improved water quality BNG due to habitat creation and winter cover provides habitat for birds, mammals, and insects.
Best available evidence	No – P reduction estimates are highly variable and may require further research.
Wider environmental considerations	Implementation of this option is unlikely to be significantly constrained by wider environmental factors.
Evidence of effectiveness	Although there is scientific evidence to suggest that cover crops are effective in reducing the supply of P from agricultural land, estimates show considerable variation. There is therefore a degree of uncertainty associated with the effectiveness of this solution. It is expected that a conservative removal rate of 30% could be applied for cover crops. Monitoring would then be required to access 'credits' for removal rates above 30%.
Precautionary	Yes, a conservative, precautionary estimated P removal rate of 30% is assumed.
Securable in perpetuity	This solution is securable in perpetuity through management agreements, particularly where land is leased.
Cost estimate	Annual maintenance costs estimated to be £150/ha/yr (AHDB, 2020)

3.3.2.5 Installation of SuDS in new developments

SuDS are efficient sediment traps that reduce the amount of runoff entering a watercourse. There are a variety of SuDS that can be installed with new developments, such as SuDS wetlands, swales and conveyance channels, filter strips and rain gardens. The different SuDS types are explored in **Table 3.19**, which provides an overview of installing SuDS in new developments as a solution.

Table 3.19: Key considerations of the installation of SuDS in new developments

Descriptor	Definition
Description of solution	The fundamental principles of SuDS are to slow flow and promote infiltration, allowing rainfall to enter the groundwater where it falls. SuDS that promote the infiltration of water and settlement of sediment will have the greatest benefit for P removal.

Descriptor	Definition
	Similarly, SuDS that provide an environment for vegetation to uptake P will achieve good removal rates. SuDS used in combination and that are linked in a treatment train, often culminating in a SuDS wetland, represent the most favourable scenario. Examples of different SuDS and their benefits are outlined below.
Delivery timescale	A requirement to implement SuDS as part of all new developments can be established in the short term.
Duration of operation	Once installed, SuDS are assumed to be permanent drainage and nutrient management solutions.
Nutrient removal	<p>The CIRIA C808 (Bradley <i>et al.</i>, 2022) document; 'Using SuDS to reduce phosphorus in surface water runoff' works towards definitive recommendations for the use of SuDS for P removal.</p> <p>The document sets out SuDS deployment via 'treatment trains' to achieve good practice P removal which are expected to be set out at full planning applications stages. A precautionary reduction in the runoff rate of P from new developments can be achieved for developments that secure the good practice SuDS set out in the document.</p> <p>The document summarises the relative performance of SuDS components for P capture and removal which is noted as highly variable. Where SuDS promote infiltration, it is assumed that 100% of the TP is removed if certain criteria have been met:</p> <ul style="list-style-type: none"> ▪ The SuDS installation is not subjected to significant flooding (no in flood risk zone 2 or 3) ▪ The SuDS installation is in an area where the high-water table groundwater depths is at least 1m below the the base of the proposed solution. ▪ The total pollution risk score for the SuDs installation is less than 180, calculated using Highways England (2020) and Table 26.6 of Woods Ballard <i>et al</i> (2015). <p>It is noted that the full removal rates can only be claimed for the first drainage asset in the drainage management train and only 50% for each asset thereafter.</p> <p>The TP removal from conveyed flows which are not infiltrated are presented in Table 3.20.</p>
Applicability	This solution is applicable to all new dwellings in the catchment and should be designed from an early stage. The size of the site will control the design and P removal potential.
Management and maintenance	The long-term performance of SuDS would also need to be secured through maintenance agreements, e.g., via Section 106 rather than planning conditions given the required duration of these commitments. There will be routine/ regular, occasional, and remedial maintenance (e.g. de-silting).
Additional benefits	<ul style="list-style-type: none"> ▪ Improved water quality ▪ Reduced erosion ▪ Habitat creation / BNG ▪ Improved amenity value
Best available evidence	Yes – P removal rates derived from CIRIA.
Wider environmental considerations	The use of SuDS in new developments is unlikely to be significantly constrained by wider environmental factors.
Evidence of effectiveness	There is currently limited evidence to demonstrate the efficiency of SuDS measures in the removal of nutrients from runoff. However, parallels could potentially be drawn with the evidence base for their effectiveness in attenuating flows and reducing sediment supply.
Precautionary	A precautionary approach can be adopted when implementing this solution.
Securable in perpetuity	Yes, though maintenance agreements (such as Section 106 agreement) may be required.
Cost estimate	Costs are highly variable and site specific. Likely to be £20/m ² – £40/m ²

Table 3.20: Performance of SuDS components for phosphorus capture and removal (Edited from CIRIA C808 (2022))

Relative performance	Swale	Detention basin	Retention basin	Pond	Floating wetland	Bioretention zone	Tree pit	Filter strip	Filter drain	Willow beds	Permeable pavement	Vortex grit separator	Oil water separator	Stormwater filter	Granular treatment media	Rainwater and stormwater capture
Sediment capture capability	28%	28%	28%	38%	38% settled in pond	44%	44%	22%	22%	100%	38%	28% based on 50% Total Suspended Solids (TSS) removal	28% based on 50% TSS removal	44% if sediment removal device included upstream	44% if sediment removal device included upstream	N/A
Dissolved phosphorus capture / removal	Nil	12%	50%	50%	Test results provided by manufacturer	Nil	Nil	Nil	Nil	100%	Nil	Nil	Nil	Up to 90% if the media selected specifically for P capture		N/A
TP removal	15.4%	20.8%	37.9%	43.4%	20.9%	24.2%	24.2%	12.1%	12.1%	100%	20.9%	15.4%	15.4%	64.7%	64.7%	N/A

3.3.2.6 Retrofitting SuDS in existing developments

Retrofitting SuDS into existing developments will provide efficient sediment traps and a reduction in the amount of runoff entering watercourses. **Table 3.21** presents the key considerations for the use of retrofitting SuDS for nutrient offsetting or reduction.

Table 3.21: Key considerations for retrofitting SuDS

Key considerations	
Description of solution	Retrofitting SuDS into existing developments will provide efficient sediment traps and a reduction in the amount of runoff entering watercourses.
Delivery timescale	Medium-term
Duration of operation	Permanent
Nutrient removal	Highly variable and will likely need specific calculations. The best SuDS for retrofitting are likely to include swales, bioretention areas, filter drains, tree pits and porous paving.
Management and maintenance	The long-term performance of SuDS would also need to be secured through maintenance agreements. Maintenance works would include desilting of swales, wetlands, and basins to maintain their efficiency. Vegetation management of buffers would be necessary to maintain the optimum roughness/ composition and sediment trapping efficiency.
Applicability	Location specific
Additional benefits	<ul style="list-style-type: none"> Improved water quality Reduced erosion Habitat creation Improved amenity value
Best available evidence	No - Monitoring may be required to determine the efficacy of specific schemes.
Wider environmental considerations	The use of SuDS in new developments is unlikely to be significantly constrained by wider environmental factors
Evidence of effectiveness	Yes - P removal rates derived from CIRIA
Precautionary	Yes
Securable in perpetuity	Yes - maintenance agreements may be required
Cost estimation	See Table 3.19 .

3.3.2.7 Paddock management

Paddock management can be effective if good equine pasture management is undertaken and is based on the concept that off-site removal of manure entails removal out of catchment. Information has been taken from a recent Technical Note for Donnington Veterinary Hospital by Ardent (2023) and combined with other relevant information in **Table 3.22**.

Table 3.22: Key considerations for paddock management

Descriptor	Definition
Description of solution	All manure wastes are regularly collected and removed from the application site by a licenced waste carrier and disposed of at a licenced or otherwise approved facility outside the Lambourn catchment. Similarly, liquid wastes are drained from the stables and yards and collected in a lagoon/tank where it is regularly emptied by tanker.
Delivery timescale	Short-term
Duration of operation	Temporary in the absence of a legally binding method of securing adherence to a Land Management Plan. Permanent if a planning obligation Section 106 agreement is made. This solution is included on the basis that it can only be considered with a legally binding agreement.
Nutrient removal	All phosphorus sources from the site would be removed, therefore achieving 100% TP removal.
Applicability	Applicable to equine paddocks and commercial veterinary centres
Management and maintenance	At least twice weekly removal of manure from pasture is required to be effective according to the British Horse Society
Additional benefits	Reuse of manure off-site can reduce pressure on resources
Best available evidence	Yes – legacy P may require future research on a site-specific basis
Wider environmental considerations	Removal of manure out of the catchment is likely to require fuel for transport and machinery, therefore incur carbon emission. Furthermore, the waste could be transported to an adjacent catchment where it will increase nutrient loading, albeit to a less protected catchment.
Evidence of effectiveness	Yes – as detailed within Ardent's 2023 Donnington Veterinary 2104391-03 nutrient neutrality technical note which indicates 100% TP removal is possible.
Precautionary	Yes
Securable in perpetuity	Yes – via a Section 106 agreement and adherence to a Land Management Plan
Cost estimate	Research required into cost of manure as potential product and cost to remove. Cost for disposal also needs consideration if sale as a product is not possible.

3.3.3 Wastewater management solutions

3.3.3.1 Expedite planned improvements to treatment works

Bringing forward scheduled improvements to treatment works which are planned to be online by 2025 or 2030 will reduce the temporary mitigation burden. In addition, it may be possible for both permitted and unpermitted WwTWs to use innovative new technologies that use microbes and aquatic plant growth in greenhouses to uptake nutrients and contaminants from the wastewater into plant biomass, as described in **Section 3.3.3.6** (alternative wastewater treatment providers).

Table 3.23 provides an overview of expediting planned improvements to treatment works as a solution.

Table 3.23: Key considerations of expediting planned improvements to treatment works

Descriptor	Definition
Description of solution	In many cases, water companies will complete infrastructure upgrades to WRCs in advance of AMP deadlines but would not operate at the future permit limit until required to do so to save on operational costs. Operating these WRCs at the permit limit in advance of original deadline reduces the amount of temporary

Descriptor	Definition
	mitigation that needs to be delivered. Agreements would need to be in place between the water company, environment agency and Ofwat.
Delivery timescale	The delivery timescales are dependent on the level of existing infrastructure in place and how quickly the effluent concentrations could reach the target concentration.
Duration of operation	This is a short-term intervention that would be operational between the agreed expedited date and the original planned improvement date.
Nutrient removal	TP removal potential: Unknown at this stage, it would dependant on how many schemes could be delivered. Chieveley is scheduled to operate at a permit limit of 0.45mg/l by 2025 and 0.25mg/l by 2030. Bringing forward the 2030 improvement would reduce the temporary mitigation burden by 0.56 kg/yr for each year.
Applicability	WRCs planned for upgrades in 2025 and 2030 – primarily Chieveley.
Management and maintenance	Nothing in addition to the regular maintenance and monitoring requirements fulfilled by the water company.
Additional benefits	This solution is unlikely to deliver any wider environmental benefits.
Best available evidence	This solution used the best available evidence.
Wider environmental considerations	Achieving low TP effluent concentrations may require extensive chemical dosing, which is typically imported, e.g., from China, and may be associated with carbon dioxide emissions.
Evidence of effectiveness	The WRC upgrades will employ industry best practise in order to achieve the desired TP effluent concentrations. Mandatory monitoring of effluent quality can be used to verify the intended reductions have been achieved.
Precautionary	Precautionary measures can be implemented.
Securable in perpetuity	Yes - the schemes would go beyond what was originally planned.
Cost estimate	Thames Water may be willing to bring forward these improvements following pressure from the Environment Agency. Alternatively, funding could be provided by developer contributions. Costs are uncertain and would need to be provided by Thames Water. The likely costs associated with expediting improvements will be the operational and management costs, e.g., phosphorus dosing and energy costs to operate to a lower permit limit.

3.3.3.2 Improvements to treatment works

An overview of improving the effluent concentration at unpermitted wastewater treatment works within the catchment is provided in **Table 3.24**.

Table 3.24: Key considerations of improving treatment works

Descriptor	Definition
Description of solution	<p>Much of the additional nutrient load from new residential development comes from the increase in wastewater production that results from the additional population occupying new developments. Raw sewage entering a municipal Wastewater treatment works is highly enriched in phosphorus. Most WwTWs have primary and secondary treatment of wastewater, which uses settlement of sediments and biological removal processes to remove organic pollution and some dissolved nutrients (Rout <i>et al.</i>, 2021).</p> <p>However, secondary treatment does not remove a significant amount of nutrients from wastewater and tertiary treatment systems are needed to provide large reductions in P concentration and load in the final treated effluent discharged by a WwTWs (Kang <i>et al.</i>, 2008). Tertiary treatment to remove nutrients at WRCs is often termed 'nutrient stripping.' Installation of nutrient stripping technologies at WRCs requires significant capital expenditure by the water company and as such, a relatively small number of WwTWs have tertiary treatment to remove nutrients.</p>

Descriptor	Definition
	<p>The Levelling Up and Regeneration Bill (LURB) is proposing a mandate for all WRCs that serve more than 2,000 people (> 2,000 PE) to be upgraded to TAL by 2030. TAL concentrations for P in treated wastewater is 0.25 mg TP/L. Furthermore, some WwTWs will be required to improve their effluent concentration through the Water Industry National Environment Programme (WINEP).</p> <p>Any WwTWs not requiring upgrades through the LURB and WINEP could deliver phosphorus mitigation. This is likely to apply to Fawley, Wickham and Winterbourne.</p>
Delivery timescale	The delivery timescales are dependent on the level of existing infrastructure in place and how quickly the effluent concentrations could reach the target concentration.
Duration of operation	This solution is a permanent solution that would deliver mitigation in perpetuity.
Nutrient removal	<p>TP removal potential, assuming a final effluent concentration of 2 mg/l, are as follows:</p> <ul style="list-style-type: none"> Fawley: 16.07 kg/yr Wickham: 37.61 kg/yr Winterbourne: 12.86 kg/yr
Applicability	Unpermitted WRCs in the catchment.
Management and maintenance	Nothing in addition to the regular maintenance and monitoring requirements fulfilled by the water company.
Additional benefits	This solution is unlikely to deliver any wider environmental benefits.
Best available evidence	This solution used the best available evidence.
Wider environmental considerations	Achieving low TP effluent concentrations may require extensive chemical dosing, which is typically imported, e.g., from China, and may be associated with carbon dioxide emissions.
Evidence of effectiveness	The WRC upgrades will employ industry best practise in order to achieve the desired TP effluent concentrations. Monitoring of effluent quality can be used to verify the intended reductions have been achieved.
Precautionary	Precautionary measures can be implemented.
Securable in perpetuity	Yes - the schemes would go beyond what was originally planned.
Cost estimate	It is anticipated that nutrient credits would be used to pay for, or contribute partly towards, upgrades of some of the WRCs. Costs are uncertain and would need to be provided by Thames Water, however, information from WBC indicates Thames water have recently estimated in order to achieve TAL in the WwTW's at Fawley, Wickham and Winterbourne £3.5 million each capital costs plus an additional £165,000 per annum revenue costs.

3.3.3.3 Installation of cesspools and capture outputs from private sewage systems

Cesspools and capture outputs from private sewerage systems offer the possibility of tankering waste from dwellings within the catchment to registered waste facilities outside of the catchment. **Table 3.25** provides an overview of installing cesspools and capture outputs from private sewage systems as a solution.

Table 3.25: Key considerations of installing cesspools and capture outputs from private sewage systems

Descriptor	Definition
Description of solution	<p>Closed cesspool systems offer the possibility of tankering waste from dwellings within the catchment to registered waste facilities outside of the catchment. As a result, there would be no increase in wastewater loading to the River Lambourn SAC from developments that use this approach.</p> <p>There are some locations towards the edge of the catchment where the distance waste would be carried is minimal. There is some risk of overflow and leak causing nutrients to be released into the environment, however we assume compliance with the associated planning conditions, building regulations, and the Environment Agency's General Binding Rules.</p>
Delivery timescale	The implementation of this solution will require the installation of new infrastructure and would require planning permission. The solution is assumed to be achievable in the short-term.
Duration of Operation	Cesspools would require regular maintenance to maintain their effectiveness and are an impermanent solution that could be used until a permanent solution can be implemented.
Nutrient removal	Nutrient removal rates will be dependent on the number of dwellings. The use of cesspools will temporarily remove the entire wastewater contribution from catchment. This could be coupled with a well-designed SuDS scheme which could remove P contributions from surface water runoff and therefore achieve nutrient neutrality.
Applicability	This option could potentially be applicable to new or existing developments that cannot currently be connected to the foul drainage network.
Management and maintenance	Cesspools would need to be emptied regularly and the owner would be responsible to ensure they do not leak or overflow. Where a cesspool causes pollution, it would break the law and the Environment Agency could take legal action under the Water Resource Act 1991, which can carry a fine of up to £20,000 and three-months imprisonment. Similarly, the Environment Agency and Local Authority can enforce repairs or replacements of cesspools in poor condition.
Additional benefits	There are no additional benefits associated with cesspools.
Best available evidence	This mitigation solution is based on the best available evidence.
Wider environmental considerations	<p>Cesspools could cause a significant increase in carbon production. If water company infrastructure allows for mains connection in the future, water companies would be obliged to connect and wastewater would then be contributing to loads into the catchment, requiring further mitigation.</p> <p>This solution involves moving the nutrient loads from one catchment to another, which could lead to increased nutrient concentrations in these river catchments.</p>
Evidence of effectiveness	This solution is reliant on treatment of wastewater at a dedicated WRC therefore it is assumed to be highly effective.
Precautionary	A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	Yes – management agreements will likely need to be put in place, especially where land is leased. Replacements may be required if the lifetime is less than the developments.
Cost estimate	<p>Capital costs: approx. £3,000 - £6,000.</p> <p>Operational costs: £3,200 - £5,600 per year.</p>

3.3.3.4 Replacement of package treatment plants and septic tanks

Older package treatment plants and septic tanks are typically poorly performing and often have high phosphorus effluent concentrations. Replacing these poorly performing onsite treatment plants with new treatment plants can provide significant nutrient mitigation. **Table 3.26** provides an overview of replacing onsite treatment plants as a solution, and **Table 3.27** provides approximate P removal rates for the main PTP manufacturers.

Table 3.26: Key considerations of installing PTPs

Descriptor	Definition
Description of solution	<p>Correctly operated and well-maintained PTPs produce a higher quality effluent which may be able to be discharged to a soakaway, surface water or groundwater in some circumstances, as well as to drainage fields. Septic Tanks (STs) are an alternative type of basic onsite wastewater treatment along with PTPs. Alterations to existing PTPs and ST or installing new tanks to provide additional dosing could achieve significant nutrient reductions. Typically, older PTPs (especially those without P dosing) will be discharging effluent at a much higher concentration than new PTPs.</p> <p>An assumption is made that a default ST will have an effluent concentration of 11.6 mg/l TP. A default PTP will have an effluent concentration of 9.7 mg/l TP. It is assumed that a future PTP would have an effluent concentration of 1.6 mg/l TP. Assuming general parameters on occupancy and flow rates the likely mitigation yield per PTP replacement is 0.77 kg/year.</p>
Delivery timescale	PTPs typically take three months to deliver and set up; they can therefore be implemented over short timescales. An environmental permit is likely to be required for any discharges from the PTP.
Duration of operation	PTPs are considered a permanent solution. It is assumed that the PTP would be replaced with a model that has at least the same P removal in the future.
Nutrient removal	Assuming a default PTP is replaced with a new PTP with a TP effluent concentration of 2 mg/l, approximately 0.97 kg/yr of mitigation would be created. The replacement would have an estimated additional cost of approximately £15,000.
Applicability	PTPs could potentially be applicable to all residential developments that cannot currently be connected to the existing foul sewer network.
Management and maintenance	Some maintenance of the PTP would be required. Where additional P stripping is used, this should be applied in accordance with the design instructions. It is noted that Natural England do not currently accept the use of PTP's that require chemical dosing as the dosing cannot be satisfactorily monitored and therefore has a large degree of risk and uncertainty.
Additional benefits	This solution is unlikely to deliver any additional or wider environmental benefits.
Best available evidence	This solution uses the best available evidence from the available data.
Wider environmental considerations	The use of package treatment plants could potentially have implications for the local population, including visual impact, noise, and odour. Energy use may also be an important consideration.
Evidence of effectiveness	The manufacturers of PTPs have undertaken detailed testing of their performance and can provide certainty regarding the level of nutrient removal that can be achieved (Table 3.27). An advice note jointly published by Somerset Authorities in consultation with Environment Agency and Natural England in September 2022 states that all new ST and PTPs must undergo independent third-party testing to meet British Standards (BS EN 12566) with certification setting out the mean concentration of the effluent from that system.

Descriptor	Definition
Precautionary	A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	<p>No – management agreements will likely need to be put in place, especially where land is leased. Replacements may be required if the lifetime is less than the developments.</p> <p>Natural England have advised that PTPs provide limited biological treatment without additional phosphorus dosing into the system, causing unreliable TP removal rates, and subsequently should not be accepted as a viable mitigation solution. However, treatment plants typically achieve the lowest effluent concentrations. Management agreements could be put in place to provide additional certainty regarding management of the PTPs but this will incur additional costs and administration. Alternatively, PTPs which do not require additional dosing could be selected (typical effluent concentration of 2mg/l) and would represent a much simpler option meet the requirements of the habitat regulations.</p> <p>A filter media could also be used to further reduce effluent concentrations and would not require as much management and maintenance as chemical dosing.</p>
Cost estimate	Capital expenses will depend on plant size. The upper range will be approximately £10,000 - £15,000 for purchasing and installation. Additional costs are from administration (£5,000), Legal fees (£5,000), technical sign off (£2,500) and contingency (£5,000). As such, the estimated cost per plant is £30,000

Table 3.27: Main PTP manufacturers P removal rates

System	Removal rate / concentration	Source
Graf One2clean plus	95.1% / 1.6 mg/l	https://www.graf.info/fileadmin/media/Catalogue_Wastewater_Treatment_Solutions.pdf
Kingspan Klargestar BioDisc	2 mg/l	Klargester Biodisc Sewage Treatment System Kingspan Great Britain
WPL HiPAF	3 - 6 mg/l	WPL HiPAF® Sewage System - WPL WCS EE Division (wplinternational.com)

3.3.3.5 Installation of Portable Treatment Works

Portable Treatment Works (PTWs) are typically used by water companies during upgrades and can be used as a secondary treatment system designed specifically for P removal. **Figure 3.8** provides an example of a PTW and **Table 3.28** provides an overview of installing PTWs as a solution.



Figure 3.8: Example of a portable containerised wastewater treatment works (Source: Vikaspumps.com)

Table 3.28: Key considerations of portable treatment works (PTWs)

Descriptor	Definition
Description of solution	PTWs can be used as short-term solutions whilst other mitigations options are designed and developed. Other examples of portable treatment works include portable vertical flow wetlands. The portable treatment works typically have a small footprint of <0.2ha.
Delivery timescale	PTWs typically take three months to deliver and set up; they can therefore be implemented over short timescales. They are typically built inside standard 20 ft shipping containers making them easy to install and move to another site (Figure 3.8). An Environmental Permit is likely to be required for any direct discharges from the PTWs.
Duration of operation	This solution is envisaged to be a temporary solution that would be used until permanent solutions can be implemented. However, there is the potential for PTWs to be used over longer timescales as an impermanent solution, although costs may be proportionately high.
Nutrient removal	<p>TP removal potential: Effluent to 0.5 mg/l can be achieved. This can apply to all existing houses served by the WwTWs.</p> <p>Installing a PTWs to an unpermitted WRC would achieve the following phosphorus estimated reductions:</p> <ul style="list-style-type: none"> ▪ Fawley – 22.10 kg/yr ▪ Wickham – 51.71 kg/yr ▪ Winterbourne – 17.68 kg/yr
Applicability	This solution is most likely to be applicable for use in a WwTWs alongside existing treatment equipment.
Management and maintenance	Some maintenance on the system is required, equivalent to a few hours a week, likely to be carried out by staff from the rental company.
Additional benefits	Potential for water quality improvements.
Best available evidence	A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.

Descriptor	Definition
Wider environmental considerations	Potential implications such as including visual impact, noise, and odour on the local population. Energy use may also be an important consideration. Disposal of waste produced by the portable works may need to be removed and handled appropriately. There is the potential for the waste to be applied as a replacement to imported fertiliser.
Evidence of effectiveness	The manufacturers of PTWs have undertaken detailed testing of their performance and are able to provide certainty regarding the level of nutrient removal that can be achieved.
Precautionary	A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	Yes – management agreements will likely need to be put in place, especially where land is leased. Replacements may be required if the lifetime is less than the developments.
Cost estimate	Capital costs £10,000 - £100,000 depending on size. Maintenance costs £1,000/yr - £5,000/yr.

3.3.3.6 Use alternative wastewater treatment providers

Alternative WRC providers will treat foul water from new developments by designing, consenting and building an alternative treatment works. There is significant cost of laying pipework and therefore such schemes are feasible for developments with a large number (over 500) of dwellings. It may be possible for multiple customers to corroborate to make a feasible number of adjoining sites.

Although full details are not currently available, alternative and current wastewater treatment providers could use new and innovative technologies such as those provided by Organica Water⁴. This technology allows wastewater to flow through 'reactors' approximately 5-6m deep within greenhouses. Aquatic plants and microbes within the reactor's digest/uptake nutrients and other contaminants into the biomass of the plant. There appears to be potential to use this type of 'Food Chain Reactor' technology as a standalone method or part of the process in addition to pre-existing facilities. This mitigation option is not detailed further because it has not been possible to obtain further detail, specific data on nutrient removal, or determine if the UK climate inhibits this as an option.

Table 3.29 provides an overview of the use of alternative wastewater treatment providers.

Table 3.29: Key considerations for use of alternative wastewater treatment providers

Descriptor	Definition
Description of solution	New Appointments and Variations (NAV) provide sewerage services in an area which is currently or previously provided by the incumbent monopoly provider. Companies that are not defined by region and that can operate anywhere in England could potentially provide alternative wastewater solutions. Using alternative wastewater providers would be most applicable where a development is currently proposed to connect to a WRC with no or limited nutrient stripping currently or in the future. Alternative providers would be able to build bespoke treatment works which can achieve the desired effluent concentrations and outperform the proposed WRC.
Delivery timescale	Setting up an alternative wastewater provider typically takes up to three years to deliver and set up; they can be implemented over a long timescale. The WRC would need to comply with permits and ensure that environmental impacts, such as visual and odour impacts are limited.

⁴ <https://www.organicaewater.com/>

Descriptor	Definition
Duration of operation	This solution is considered to be a permanent long-term solution.
Nutrient removal	The alternative WRC providers build bespoke plant for developments which includes nutrient stripping. Assuming this solution is used on a housing development of approximately 500 dwellings, effluent from a WRC can achieve 0.5mg/l, this could deliver a P loading of 10 kg/yr, which would be 8 kg/yr lower than if the development was to drain to Newbury WwTW under current permit limits. However, this solution is a viable solution up to 2030. It is not considered to be a solution beyond 2030 because the effluent concentrations at Newbury would be lower following the amendments to the LURA
Applicability	This solution would not completely mitigate excess nutrient loading from developments and mitigation would still be required through other solutions. However, it could significantly reduce the mitigation required which could potentially be addressed through on-site measures such as Sustainable Drainage Systems (SuDS).
Management and maintenance	The management and maintenance will be provided by the local operator. The maintenance of this system is paid through foul drainage bills.
Additional benefits	Can be integrated with SuDS to deliver flood risk benefits and amenity space.
Best available evidence	Yes.
Wider environmental considerations	Implementing this scheme is unlikely be significantly constrained by the wider environment.
Evidence of effectiveness	Yes - P effluent concentrations of 0.5 mg/l are achievable, which is very close to industry best removal rates. The evidence of effectiveness for the removal of TN cannot be calculated as the wastewater providers did not provide the TN effluent concentrations.
Precautionary	Yes - A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	Yes – management agreements will likely need to be put in place, especially where land is leased. Replacements may be required if the lifetime is less than the developments.
Cost estimate	Capital Expenses will depend on the plant size, ranging from approximately £1.9 Million to £3.8 Million.

3.3.3.7 Rectifying misconnections to combined systems

Misconnections occur at a local property level when household wastewater is connected to a surface water drain instead of the local sewer network. **Table 3.30** provides an overview of rectifying misconnections to combined systems.

Table 3.30: Key considerations for rectifying misconnections to combined systems

Descriptor	Definition
Description of solution	Misconnections can cause pollution to the local environment and cause problems for bathing waters. The solution for this is to identify the misconnections and rectifying them so that the household wastewater is connected to the local sewer network. Examples of misconnections include washing machines and dishwashers which typically have a high P content.
Delivery timescale	Rectifying a misconnection to a surface water drain can be established in the short term. However, the process for identification of misconnections and subsequent connection is subject to a long-term timescale.
Duration of operation	Once the misconnection has been remediated, it is assumed to be a permanent drainage and nutrient management solution.
Nutrient removal	Highly variable and specific calculations would need to be established.

Descriptor	Definition
	In order to quantify the nutrient saving from rectifying misconnections, assumptions would need to be made on concentrations of the appliances/ fitting that were misconnected. Wastewater volumes could be estimated using the Part G calculator ⁵ . It is unlikely that there will be many opportunities for monitoring misconnections to retrieve meaningful data on the nutrient reductions.
Applicability	This solution could be applied to existing properties in order to provide mitigation for new dwellings.
Management and maintenance	Correction of the misconnection is the duty of the property owner. The local water company will ensure the correction is performed satisfactorily. Maintenance is likely to be minimal once correction completed.
Additional benefits	The rectification of misconnected surface water drainage networks will reduce the volume of pollutants entering the catchment and therefore benefit water quality.
Best available evidence	Yes.
Wider environmental considerations	The rectification of misconnections is unlikely to be significantly constrained by wider environmental factors.
Evidence of effectiveness	There is currently limited evidence to demonstrate the efficiency of rectifying misconnections to surface water drainage networks in the removal of nutrients from the catchment. Monitoring opportunities are likely to be limited. Therefore, generic concentrations would likely need to be applied with a conservative approach taken.
Precautionary	A precautionary approach can be taken with this method through assuming precautionary removal rates and the possible addition of precautionary buffers within the calculations.
Securable in perpetuity	Yes – management agreements will likely need to be put in place, especially where land is leased. Replacements may be required if the lifetime is less than the developments.
Cost estimate	The costs may differ due to the level of construction work associated with rectifying misconnections. Cost estimates are unknown.

3.3.3.8 Improve existing wastewater distribution infrastructure (reduce leakage from foul sewer network)

The water distribution networks in the UK are subject to leakage from sewer and (drinking) water mains are a potential source of groundwater nutrient pollution (Reynolds & Barrett, 2003). Water leaks from water distribution networks follows subsurface flow pathways to reach surface waters quickly as throughflow, or flow through superficial geological deposits and deep aquifers to enter surface waters as baseflow. Nutrient enrichment of wastewater and drinking water in water distribution networks means leaks can create sources of P to designated sites. Key considerations for improvement of existing wastewater infrastructure via reduction of leakage from the foul sewer and mains water network are summarised in **Table 3.31**.

Table 3.31: Key considerations to improve existing wastewater distribution infrastructure

Descriptor	Definition
Description of solution	Nutrient enrichment of wastewater and drinking water in water distribution networks means leaks can create sources of nutrient pollution. Raw sewage entering a municipal WRC is highly enriched in P.
Delivery timescale	Completion of infrastructure works <1 year. However, water industry AMP expenditure cycles may impact delivery timescales. Lag times due to hydrogeological flow parameters may mean impact from mitigation scheme is not seen for years to decades.
Duration of operation	Materials used in the improvement of infrastructure may provide an operational timescale in excess of 80 years. This duration can be achieved with the assumption that the system is managed and maintained, and other factors such as pipe failures and ground movements do not adversely impact it.

⁵ <https://wrcpartgcalculator.co.uk/>

Descriptor	Definition
Nutrient removal	TP removal potential: 365 kg P/yr and 4,380 kg P/yr from reducing 1 MI/d of leakage from drinking water and sewer mains, respectively. This is based on published concentrations of P in drinking water and raw sewage and does not account for attenuation.
Applicability	The greater density of water distribution networks in urban areas concentrates potential nutrient pollution associated with leakage in these areas (Ascott <i>et al.</i> , 2016). As such, reducing leakage from sewers and water mains will be best targeted in towns and cities within the affected catchment areas. Much of the Lambourn catchment is within a rural setting, and this may reduce the applicability of this mitigation option.
Management and maintenance	Management and maintenance required by skilled professionals from the water and sewerage company. Pressure testing for pipe defects should be used to help detect problems. Early detection of pipe defects and rectification may result in inhibiting repaired pipes bursting. This may help increase duration timescale that may result in fixed pipes bursting again.
Additional benefits	Reductions in water pollution from other contaminants, e.g., from microbiological pollutants, and therefore benefit water quality.
Best available evidence	Yes.
Wider environmental considerations	Improvement works are unlikely to be significantly constrained by wider environmental factors. Consideration should be given to managing construction works which may be required as part of improvement works to minimise environmental impacts by using a CEMP for example.
Evidence of effectiveness	Yes - There is a significant range in the potential reductions in nutrient load that will occur along subsurface flow pathways, with studies citing P removal efficiencies from 0.4% to 99% for different types of soil and sediment (Penn <i>et al.</i> , 2017).
Precautionary	Yes - Assuming allowance for attenuation of P on subsurface flow pathways.
Securable in perpetuity	Yes - Assuming appropriate robust management and maintenance plans.
Cost estimate	This is variable depending on the size of a scheme, and meaningful information on costs for fixing sewer leaks has not been possible to obtain. An estimated ~£1 million to reduce 365 kg P/yr from leaking water mains, assuming no attenuation of P on subsurface flow pathways.

3.3.4 Demand management solutions

3.3.4.1 Retrofit water saving measures in existing properties (Local Authority, Registered Providers, public buildings)

When water saving measures are retrofitted into existing properties (such as buildings that belong to Local Authority (LA), Registered Providers, and Public Buildings), the water usage saved from the retrofitted properties will be replaced by the additional water demand from new dwellings. Key considerations are summarised in **Table 3.32**.

Table 3.32: Key considerations of retrofitting water saving measures (LA, Registered Providers, and Public Buildings)

Descriptor	Definition
Description of solution	<p>When retrofitting water saving appliances the volume of water entering the treatment works will stay the same and providing the treatment works operates to a permit limit, the effluent discharge concentration remains the same. There is a greater potential for reducing P loading associated with older rather than more recently constructed dwellings.</p> <p>This solution is only applicable to existing dwellings where an organisation has control over fittings and any upgrade works.</p> <p>Requirement G2 and Regulations 36 and 37 of the Building Regulations (2015) introduce a minimum water efficiency standard for new dwellings of no more than 125 l/person/day. The UK Government also</p>

Descriptor	Definition
	introduced an optional requirement of 110 l/person/day for new dwellings (excluding properties owned by Local Authorities and Registered Providers), which Local Planning Authorities must adhere to in future Local Plans. As a result, these two figures were used as targets when retrofitting water efficient appliances and fittings. This solution is not applicable to WwTWs without a permit limit.
Delivery timescale	Short-term
Duration of operation	Permanent – The fittings will be in place for the lifetime of the development and any replacements required will be to the same efficiency or better.
Nutrient removal	Wastewater achievable reductions of 40 litre/ person/ day. Approximately three existing dwellings will need to be retrofitted for every single new dwelling.
Applicability	Applicable to Housing and buildings owned by Local Authorities or Registered Providers
Management and maintenance	Replacement parts of the same or better efficiency must be used. Monitoring compliance checks required.
Additional benefits	<ul style="list-style-type: none"> ▪ Sustainability ▪ Water resources ▪ Reduced water bills for residents and/or organisations
Best available evidence	Yes – UK government published calculator would be used for calculating water usage for appliances.
Wider environmental considerations	This option may reduce water use in the south of England, an area of the UK, which is under water stress, saving water as a valuable resource.
Evidence of effectiveness	Yes - UK government published calculator would be used for calculating water usage for appliances.
Precautionary	Yes – precautionary assumptions can be applied to the water saving calculations.
Securable in perpetuity	<p>Yes – Where a Local Authority or Registered Provider have ownership and control of dwellings that are due to be retrofitted with more water efficient fittings. Registered providers may need to evidence water savings through water bills pre and post improvements.</p> <p>Where a scheme is proposed by private housing, commercial and industrial premises then this solution is unlikely to have sufficient certainty in perpetuity. In these cases, there is a greater risk that replacement fittings would not meet the required water efficiency.</p>
Cost estimate	£4,000 per new dwelling for a full retrofit (taps, toilets, showers, bath).

3.3.4.2 Incentivise commercial water efficiency

Operators of a consent to discharge trade effluent would install treatment facilities ahead of discharge to the sewerage network. The installation of which would be enforced via the consent provided by the water company. Key considerations are summarised in **Table 3.33**.

Table 3.33: Key considerations of incentivising commercial water efficiency

Descriptor	Description
Description of solution	For reasons of commercial confidentiality and/ or competition law it is considered necessary that this option would be led by a party other than the local sewerage undertaker (water company). A water company is the regulator of trade effluent discharge licence consents into the foul sewer network and the Environment Agency regulates effluent discharge into the surface water catchment (and groundwater). Operators of a consent to discharge trade effluent would install treatment facilities ahead of discharge to the sewerage network, the installation of which would be enforced via the consent provided by the water company.
Delivery timescale	Long-term
Duration of operation	Permanent – This would require the installation of a permanent treatment facility on site.
Nutrient removal	The nutrient removal calculations have not been undertaken and this option would require specific discharge output detail to develop an understanding of the plausible removal potential. However, the concept of this option is considered to remove nutrient from the catchment at a point upstream of the point of discharge to surface water (or groundwater).
Applicability	The incentivisation of water efficiency is applicable to businesses which discharge into the catchment either via WRCs, which are regulated by the Water Industry Act 1991 as amended, and the Environmental Permitting Regulations 2016 as amended, and direct to surface water or groundwater, as regulated by the Environment Permitting Regulations 2016 as amended.
Management and maintenance	The treatment facilities will require regular management and maintenance to maintain effective operation. Waste removal of solids in the form of 'filter cake' or similar is anticipated. Regulators of a discharge consent would review monitoring data for compliance and undertake site inspections.
Additional benefits	Other potentially harmful substances within the discharge could also be captured via on site treatment facilities, therefore benefitting water quality.
Best available evidence	Industry best practise methods and site-specific data can be used when determining the nutrient removal.
Wider environmental considerations	Construction work to install on-site treatment facilities, and operation of a treatment facility, could potentially present wider environmental implications, for example: <ul style="list-style-type: none"> potential loss of habitat for new developments on greenfield sites; or, potential for pollution resulting from construction activities if good environmental management practices are not adopted, e.g., non-compliance with oil and fuel storage regulations.
Evidence of effectiveness	The treatment processes installed will be effective beyond reasonable scientific doubt.
Precautionary	Yes – precautionary principles can be adopted when calculating the nutrient removal.
Securable in perpetuity	Yes
Cost estimate	Costs are unknown and will be very site specific.

4 Summary

4.1 Summary of potential solutions

Table 4.1 provides an overview of the required land / units and associated costs required for the implementation of some of the mitigation solutions outlined in **Section 3**. Riparian buffer strips and constructed wetlands offer the greatest nutrient removal for the cost required. Replacing existing private sewer systems also provide a cost effective and implementable mitigation option. Cover cropping represents an efficient temporary solution when compared to other temporary solutions such as taking agricultural land out of use. The calculations for some mitigation solutions, such as retrofitting of water saving devices, rely upon assumptions, such as assumptions which are based on the type of proprietary technology used and the precise amount of water that can be saved. As such, the data is generic and not as robust as for those for the solutions listed in the table below. The solutions listed are also considered to be the more relevant of the solutions discussed in this document.

Table 4.1 Nutrient and cost budget summary of deliverable solutions

Solution	Removal Rate Coefficient (kg/ha/yr)	Costs used in Estimation (£)	Total Area (Ha) / Units	Estimated cost (£)	£/kg/yr	£/dwelling
Silt traps	0.095	40,000 (£500/ha per annum maintenance)	508.2	£20,329,848	£421,053	£23,314
Riparian buffer strips (Lower Lambourn)	1.27	62,880 (£786/ha/yr)	37.9	£2,383,434	£49,363	£2,733
Constructed wetlands	12	300,000	3.9	£1,170,034	£24,233	£1,342
Taking agricultural land out of use (**Upper Lambourn)	0.07	25,550 (assumes land purchase prices)	689.8	£17,623,437	£365,000	£20,210
Cessation of fertiliser	0.095	101,951	508.2	£51,816,309	£1,073,171	£59,422
Cover crops	0.114	9,920	423.5	£4,201,502	£87,018	£4,818
Upgrade existing private sewer systems	0.77 kg/yr as per Table 3.26	42,025	62.3*	£2,618,196	£54,226	£3,003

Note: * Units refer to a PTP or septic tank unit in this context as area is not relevant for these solutions.

** the Upper Lambourn is selected because it is considered to be of more relevance with respect to agricultural land use (see further explanation in Section 5).

A range of techniques can be used in the river catchments, and these are mainly aimed at slowing runoff and trapping sediment-bound pollutants. Wastewater management and demand management solutions provide an opportunity to deliver mitigation in relatively short timescales. These solutions typically have greater certainty than runoff and nature-based solutions and issues with land purchase/ rental may be possible to avoid.

Table 4.2 summarises potential nature-based solutions for the Lambourn and **Table 4.3** summarises potential wastewater management solutions.



Table 4.2: Potential nature-based management solutions summary

Solution	Delivery timescale	Duration of operation	Estimated P removal potential	Management / maintenance requirements	Additional benefits	Best available evidence	Evidence of effectiveness?	Precautionary	Securable in perpetuity?	Approximate cost estimate	Further information
Silt traps	Short-term	Impermanent	25-75%	Regular de-silting	Water quality	No	Yes	Yes	Yes	Capital costs £1,000-£4,000. Maintenance costs £500/yr.	Section Error! Reference source not found.
Riparian buffer strips	Short-term	Impermanent	0.79 kg/ha/yr to 5.72 kg/ha/yr in the upper Lambourn; and 0.70 kg/ha/yr to 5.06 kg/ha/yr lower Lambourn catchment	Vegetation cutting / management	Riverbank stabilisation Water quality Erosion reduction Habitat creation Amenity value BNG Carbon offset	Yes	Yes	Yes	Yes	Capital costs £183/ha Maintenance costs £786/ha.	Section 3.3.1.1
Wet woodlands	Short-term	Permanent	0.79 kg/ha/yr to 5.72 kg/ha/yr in the upper Lambourn; and 0.70 kg/ha/yr to 5.06 kg/ha/yr lower Lambourn catchment	Minimal to none	Recreation Carbon sequestration Biodiversity conservation Air pollution reduction Flood risk reduction Biofuel	No	No	Yes	Yes	£10,000/ha. Maintenance costs N/A as minimal.	Section 3.3.1.3
Constructed wetlands	Medium-term	Permanent	Variable	Periodic maintenance to vegetation and de-silting	Biodiversity improvement Water quality and quantity Flood hazard management Carbon offsetting Amenity	Yes	Yes – if following Constructed Wetlands Framework	Yes – if following Constructed Wetlands Framework	Yes – if following Constructed Wetlands Framework	Approximately £300,000/ha.	Section 3.3.1.4
Willow buffers	Short-term	Impermanent	67-74%	Harvest every 3-5 years Replant every 20-25 years	Water quality BNG	No	No	Yes	Yes	Capital costs £2,500/ha. Maintenance costs £200 - £300/ha/yr.	Section 3.3.1.4
Beetle banks	Short-term	Permanent	Unknown and possibly similar to riparian buffer strips	Regular cutting	BNG Soil erosion reduction	No	No	Not known at this stage	No	Unknown – possibly similar to riparian buffer strips.	Section 3.3.1.6
Beaver reintroduction	Medium-term	Beaver – impermanent Logjams - permanent	Variable – 20-80%.	Beaver – little maintenance Logjams – repair if damaged	Flood management Biodiversity Amenity	Yes	Yes	Yes	Beaver – no Logjams - Yes	Beaver – no reliable estimate. Logjams - £5,000 - £25,000.	Section 0
Taking land out of agricultural use	Short-term	Temporary Impermanent Permanent	Upper Lambourn: 0.07 kg/ha/yr Lower Lambourn: 0.36 kg/ha/yr	Harvest every 2-4 years	Energy crop BNG Soil erosion reduction	Yes	Yes	Yes	Yes	£25,550/ha land purchase for average arable land	Section 3.3.2.1

Solution	Delivery timescale	Duration of operation	Estimated P removal potential	Management / maintenance requirements	Additional benefits	Best available evidence	Evidence of effectiveness?	Precautionary	Securable in perpetuity?	Approximate cost estimate	Further information
Conversion of agricultural land to solar farms	Short-term	Permanent	Upper Lambourn 0.05 – 0.38 kg/ha/yr Lower Lambourn: 0.06 – 0.75 kg/ha/yr	Livestock number monitoring	Renewable energy provision BNG Water quality	No	Yes	Yes	Yes	Unknown.	Section 3.3.2.2
Cessation of fertiliser / manure application	Short-term	Temporary	0.02 – 0.19 kg/ha/yr	None	Suspended sediment buffer via strategic land selection	Yes	Yes	Yes	No	£1,274.37/ha/yr.	Section 3.3.2.3
Cover crops	Short-term	Impermanent	uncertainty and assumed to be ~30%, equates to 0.07 – 0.36 kg/ha/yr	Regular maintenance with preparation, planting, destruction, and cultivation of cover crops	Soil erosion reduction Water quality BNG	No	No	Yes	Yes	£150/ha/yr.	Section 3.3.2.4
Installation of SuDS in new developments	Short-term	Permanent	20-100%	Regular maintenance including de-silting	Soil erosion reduction Water quality Habitat creation Improved amenity value	Yes	Yes	Yes	Yes	Unknown and variable according to bespoke design at any particular site.	Section 3.3.2.5
Retro-installation of SuDS in existing developments	Medium-term	Permanent	20-100%	Regular maintenance including de-silting	Soil erosion reduction Water quality Habitat creation Improved amenity value	Yes	Yes	Yes	Yes	Unknown and variable according to bespoke design at any particular site.	Section 3.3.2.6
Paddock management	Short-term	Permanent	100% of input	Regular removal and cleaning	Reuse of manure reducing pressure on resources	Yes	Yes	Yes	Yes	Unknown at this stage.	Section 3.3.2.7

Table 4.3: Summary of wastewater management solutions summary

Solution	Delivery timescale	Duration of operation	Estimated P removal potential	Management / maintenance requirements	Additional benefits	Best available evidence	Evidence of effectiveness?	Precautionary	Securable in perpetuity?	Approximate cost estimate	Further information
Expedite planned improvements to treatment works	Short-term	Temporary	0.56 kg/yr for each year	Nothing in addition to the usual water company maintenance	None	Yes	Yes	Yes	Yes	Unknown and bespoke to any specific scheme undertaken by Thames Water.	Section 3.3.3.1
Improvements to wastewater treatment works	Medium-term	Permanent	12.86 – 37.61 kg/yr	Nothing in addition to the usual water company maintenance	None	Yes	Yes	Yes	Yes	Thames Water estimate £3.5M/ WwTW. Operational costs: £165,000 per year/WwTW.	Section 3.3.3.2
Installation of cesspools and capture outputs from private sewage systems	Short-term	Impermanent	100% temporarily	Regular emptying and inspection	None	Yes	Yes	Yes	Yes	Capital costs: £3,000 to £6,000. Operational costs: £3,200 to £5,600 per year.	Section 3.3.3.3
Improvements to package treatment plants / septic tanks	Short-term	Permanent	0.97 kg/yr	Regular maintenance	None	Yes	Yes	Yes	No	Capital costs: bespoke to plant size, up to £10,000 - £15,000. Additional costs likely to take total cost to £30,00/plant	Section 3.3.3.4
Installation of portable treatment works	Short-term	Temporary	0.5 mg/l	Regular maintenance	Water quality	Yes	Yes	Yes	Yes	Capital costs £10,000 to £100,000 (depending on size). Maintenance costs £1,000 to £5,000 per year.	Section 3.3.3.5
Use alternative wastewater treatment providers	Long-term	Permanent	10 kg/yr	Regular maintenance	May be integrated with SuDS to deliver flood risk benefits and amenity space	Yes	Yes	Yes	Yes	£1.9 Million to £3.8 Million dependent on the plant size.	Section 3.3.3.6
Rectifying misconnections to combined systems	Long-term	Permanent	Calculations not available to determine and removal potential unknown	Minimal maintenance once misconnection corrected.	Water quality	Yes	No	Yes	Yes	unknown	Section 3.3.3.7
Improve existing wastewater distribution infrastructure (reduce leakage from foul sewer network)	Long-term	Permanent	365kg P/yr from reducing leaks from drinking water pipes 4,380kg P/yr from reducing leaks from sewer system	Regular maintenance	Water quality	Yes	Yes	Yes	Yes	~£1 million to reduce 365 kg P/yr from leaking water mains. Sewer system costs unknown.	Section 3.3.3.8
Retrofit water saving measures in existing properties (local authority, registered	Short-term	Permanent	Approximately 40 l/person/day removal	Maintenance and compliance monitoring	Sustainability Water resources	Yes	Yes	Yes	Yes	£4,000 full retrofit.	Section 3.3.4.1

Solution	Delivery timescale	Duration of operation	Estimated P removal potential	Management / maintenance requirements	Additional benefits	Best available evidence	Evidence of effectiveness?	Precautionary	Securable in perpetuity?	Approximate cost estimate	Further information
providers, public buildings)											
Incentivise commercial water efficiency	Long-term	Permanent	Unknown	Regular maintenance	Water quality	Yes	Yes	Yes	Yes	unknown	Section 3.3.4.2

4.2 Next steps

The following sets out the next steps required to develop the solutions presented within this report to functioning nutrient mitigation solutions:

- Identification of the preferred solutions to be delivered and the likely costs, timescales, and delivery mechanisms.
- A database or spreadsheet-based tracking tool to register and record the nutrient loading for each development and through what schemes this will be mitigated.
- A tracking tool could also be expanded to track 'credits' achieved through mitigation schemes that can be used for biodiversity net gain and carbon offsetting.
- Standardised legal agreements could be drawn up and used as a basis in future mitigation schemes. Conservation covenants are one option that should be explored.
- A Mitigation Plan should be created to formulate developer contributions. In establishing such a plan, the key solutions and timescales for expected delivery would set out in addition to the roles of relevant contributors and organisations. This will allow for quantification of when and how many credits will be available.

5 Action Plan

An action plan in the catchment can be devised by weighting the feasible mitigation solutions presented in **Section 3**. The feasibility of selected options emphasises standalone application while considering the potential for broader, integrated impacts when combined. Mitigation solutions were tailored to the distinct land-use characteristics and geological conditions of the upper and lower catchments, delineated by their unique agricultural features and wastewater capacities. Preferred solutions included agricultural/land-based options for the upper catchment, known for its arable grasslands, and equine paddock management alongside retrofitting water-saving devices in both catchments to address similar wastewater treatment needs. Constructed wetlands receiving water from rivers / streams and other options such as beaver reintroduction was excluded based on unsuitability or ineffectiveness within the specific catchment contexts.

It is worth noting that emerging solutions can offer plausible mitigation and floating in-channel wetlands have not currently been considered as a feasible option until more research is conducted; these potential future mitigation solutions are detailed in **Section 5.5**.

5.1.1 Habitat Regulations Assessment requirements for a mitigation solution

The Habitat Regulations require mitigation solutions to meet the following criteria:

- The solutions should be based on the best available evidence.
- The solutions should be effective beyond reasonable scientific doubt.
- The solutions should apply the precautionary principle.
- The solutions should be secured in perpetuity (i.e., 80 years).

The mitigation provider will be responsible for ensuring that the mitigation solutions are compliant with the above criteria. The solutions must be in place and operational prior to occupation. Short-term bridging solutions can be used as temporary measures until long-term solutions are identified and established. However, in order for West Berkshire Council to be able to approve planning applications with a short-term solution that will transition into a long-term solution, details (such as the location and likely amount of phosphate removal) and certainty of delivery on the long-term solution will be required – that will need monitoring confirmation from Natural England.

To comply with The Habitat Regulations (particularly the in-perpetuity test), monitoring and maintenance will be required for most of the solutions. Maintenance obligations will vary depending on the mitigation solution. However, mitigation providers will be able to pass maintenance responsibilities to third parties via legal and financial agreements to ensure that the solution is maintained in perpetuity. In this case, a financial transaction for the mitigation measure could occur directly between the third-party and the mitigation provider. Where mitigation providers are buying into a privately run off-site mitigation scheme, these schemes would again be owned and managed by a third-party or the mitigation provider.

5.2 Identification of preferred solutions

Various mitigation solutions were considered, and preferred options were shortlisted based on the Lambourn catchment's land use features, equine paddocks, and location of associated facilities. These options were split into the upper and lower catchment areas based on the different characteristics highlighted in **Section 3** and elevation data based on the different catchments within West Berkshire and effluent output by the Winterbourne STW and Chieveley STW (**Figure 5.1**). The elevation data is presented from yellow (high elevation) to green (low elevation). Sewage Treat Work (STW) catchment areas are shown in blue.

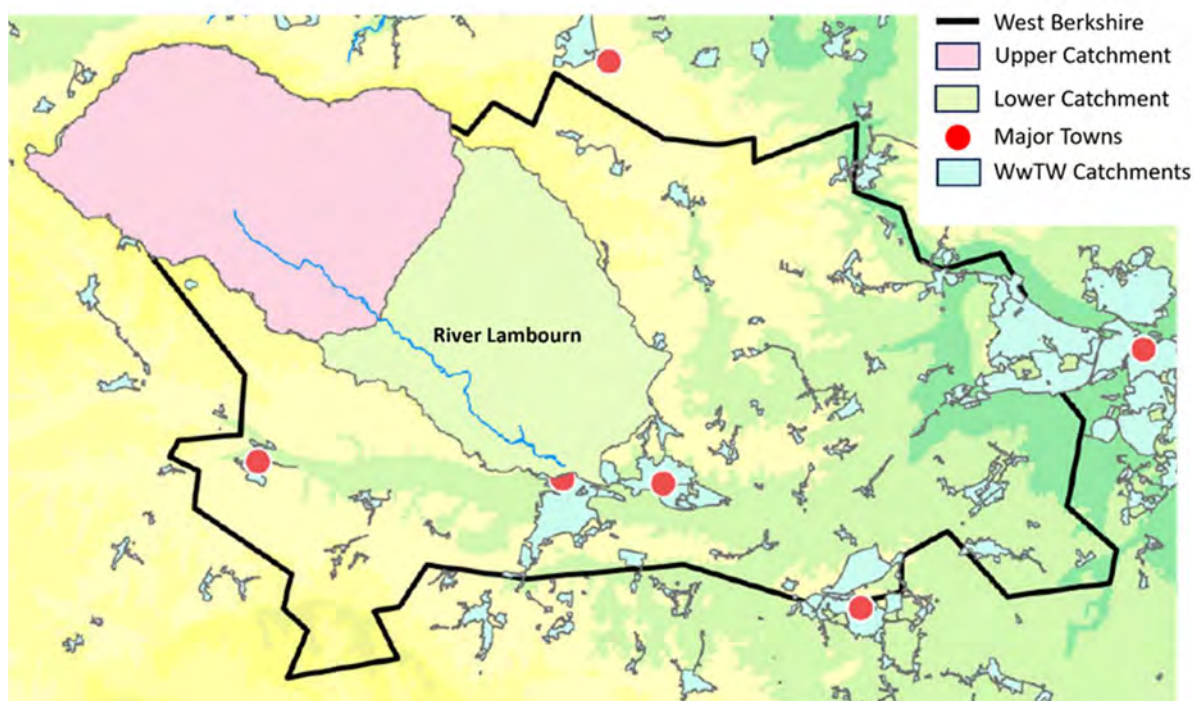


Figure 5.1 Upper and Lower catchment areas of the River Lambourn

Table 5.2 and **Table 5.3** outline preferred mitigation solutions related to nature-based strategies and wastewater management. These solutions are evaluated using a Red, Amber, and Green (RAG) scoring system, distinctly categorised to reflect their applicability within the upper and lower catchment areas. Within each catchment the RAG score is based on three key criteria: costs (capital and/or maintenance), estimated phosphorus-removal amounts, and Habitat Regulations Assessment (HRA) feasibility within the specific environmental setting. Land use data divided by the catchment area was used to determine a high level analysis of the available space for mitigation solutions. The RAG colour for each of these categories are shown in **Table 5.1**, nature-based solutions and waste water solutions were assessed separately for the cost and p-removal RAG score. Within this ranking system environmental feasibility is ranked as the most important because it is imperative for the implementation of a solution. The foundational data for the cost and P-removal evaluations is derived from **Table 4.3** and the nutrient calculator developed by West Berkshire, tailored to local land use. Each mitigation solution is quantitatively and qualitatively assigned an overall score reflecting its suitability as either a temporary (short-term) or permanent (long-term) solution, based on an aggregate of its RAG scores across both catchment areas.

The assessment of the cost, p-removal and environmental feasibility categories are a top-level assessment to provide an indicator of the suitability of some of the solutions as standalone options, the RAG assessment for these options would change if some options were used in combination.

Table 5.1 RAG score classification for the upper and lower catchment categories

Categories	Red	Amber	Green
Cost	Estimated upper quartile cost of the median maintenance and capital costs.	Estimated cost between the upper and lower quartile of the median maintenance and capital costs.	Estimated cost within lower quartile of the median maintenance and capital costs.

Categories	Red	Amber	Green
P-removal	Estimated phosphorous removal of less than 40% of the median phosphorous removal rate.	Estimated phosphorous removal of 40%-59% of the median phosphorous removal rate.	Estimated phosphorous removal of 60% or more of the median phosphorous removal rate.
Environmental feasibility	Does not pass the HRA suitability test on more than one category and/or is not feasible because the area or solution is not viable.	Passes the HRA suitability but fails one of the HRA criteria such as perpetuity. And/ or can only be implemented in very small-scale areas.	Passes the HRA suitability criteria and is feasible option for the environmental setting.

For these preferred solutions, constructed wetlands have not been considered due to extensive groundwater flooding across the catchment and chalk and peat compositions within the Lambourn catchment being not suitable for wetland construction. In addition, other options have been removed if they are not applicable to the Lambourn area, this includes reintroduction of beavers and engineered logjams (see **Table 3.10**), removal of agricultural land (see **Table 3.12**), use of alternate waste water treatment providers, and improving existing water distribution (see **Table 3.31**).

Within the upper catchment areas, there is a higher percentage of arable grassland in comparison to the lower catchment areas. This has resulted in agricultural/ land-based solutions being more feasible in the upper catchment than the lower. In addition, options like the silt traps would be more cost effective within the upper catchments, where the silt traps could decrease the nutrients entering from multiple tributaries that will encompass a larger surface area of agriculture runoff compared to just using silt traps lower on the main river. Riparian buffer strips are a plausible solution in both the upper and lower catchments; however, it is possible much of the Lambourn has riparian buffer strips already and there may not be space to add more. West Berkshire Council has provided recent examples of Natural England accepting equine paddock management and is provided as a potential standalone solution in **Table 5.2**.

Regarding waste management solutions, the upper and lower catchment areas have similar waste water treatment areas, with slightly higher populations and lower water capacity within the upper catchment. Retrofitting water-saving devices in properties, due to similar wastewater treatment capacity in both catchments, could be complementary, aiming at sustainability and reducing overall water demand.

Table 5.2: Proposed nature-based solutions RAG score for the Lambourn upper and lower catchment areas, reasons behind the RAG score have been highlighted in the feasibility comments column

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
Silt traps	Cost	£500 yr and capital costs of £1,000- £4,000 per installation.	Cost	£500 yr and capital costs of £1,000- £4,000 per installation.		
	P removal	0.025kg/ha/yr (25% has been used as a conservative assumption of the total available arable land)	P removal	0.095kg/ha/yr (25% has been used as a conservative assumption of the total available arable land)		
	Feasibility of environmental setting	Suitable for arable grassland areas in the upper catchment areas. Would not pass all HRA requirements – most notably he in-perpetuity test.	Feasibility of environmental setting	Fewer feasible areas within the lower catchment. Less prevalent arable areas close to Lambourn River and would not pass all HRA requirements – most notably he in-perpetuity test.		
Riparian buffer strips and Willow Buffer strips	Cost	£1186 ha/yr and capital costs £183/ha	Cost	£1186 ha/yr and capital costs £183/ha		
	P removal	0.30 kg/ha/yr (29% removal rate for 15m buffer))	P removal	1.27kg/ha/yr (29% removal rate for 15m buffer)		
	Feasibility of environmental setting	There are already riparian buffer strips in place, meaning the number of hectares available are reduced. Would meet the HRA requirements. There must be a 12-24m wide area of water-dependent habitat between the land and the water's edge of	Feasibility of environmental setting	The lower catchment has more available land and appropriate soil types that can be utilised as buffer strips in comparison to upper catchment areas. Would meet the HRA requirements. There must be a 12-24m wide area of water-dependent habitat		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
		<i>rivers and streams (riparian habitats) and lakes and ponds.</i>		<i>between the land and the water's edge of rivers and streams (riparian habitats) and lakes and ponds.</i>		
Wet woodlands	Cost	<i>£1186/ha/yr and capital costs £10,000/ha ~</i>	Cost	<i>£1186/ha/yr and capital costs £10,000/ha ~</i>		
	P removal	<i>0.30 kg/ha/yr (29% removal rate for 15m buffer)</i>	P removal	<i>1.27 kg/ha/yr (29% removal rate for 15m buffer)</i>		
	Feasibility of environmental setting	<i>Feasible locations in the upper catchment and would meet the HRA requirements.</i>	Feasibility of environmental setting	<i>Feasible locations in the lower catchment and would meet the HRA requirements.</i>		
Beetle banks	Cost	<i>Estimated £764 ha/yr and capital costs £183/ha</i>	Cost	<i>Estimated £764 ha/yr and capital costs £183/ha</i>		<i>The farming community would be unlikely to adopt this solution long term.</i>
	P removal	<i>0.029 kg/ha/yr (29% has been used as a conservative assumption of the total available arable land)</i>	P removal	<i>0.029 kg/ha/yr (29% has been used as a conservative assumption of the total available arable land)</i>		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	Feasibility of environmental setting	<i>Can be used in areas with arable land. Applicable in multiple areas with raised areas and suitable soil types. It is only a short-term solution so would not meet perpetuity aspect of the HRA requirements but would meet all other aspects.</i>	Feasibility of environmental setting	<i>Can be used in areas with arable land. Applicable in multiple areas with raised areas and suitable soil types. It is only a short-term solution so would not meet perpetuity aspect of the HRA requirements but would meet all other aspects.</i>		
Conversion of agricultural land to solar farms	Cost	<i>Unknown</i>	Cost	<i>Unknown</i>		<i>Until an accurate account of the costs can be calculated this cannot be considered a long-term option. It is also only feasible in the upper catchment area.</i>
	P removal	<i>0.05 – 0.38 kg/ha/yr (10%- 90% removal based on the total agricultural land available)</i>	P removal	<i>0.06 – 0.75 kg/ha/yr (10%- 90% removal based on the total agricultural land available)</i>		
	Feasibility of environmental setting	<i>A feasible option for the upper catchment. It may only have small-scale impacts and must not impact designated sites.</i>	Feasibility of environmental setting	<i>Not a feasible option for the lower catchment- less feasible environmental areas that would also pass HRA requirements in the lower catchment.</i>		
Taking agricultural land out of use	Cost	<i>£326 ha/yr</i>	Cost	<i>£326 ha/yr</i>		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	P removal	0.07 kg/ha/yr ~ (The effectiveness of this conversion in terms of phosphorus removal can vary widely, depending on factors such as soil type and existing levels of phosphorus, types of grasses planted)	P removal	0.36 kg/ha/yr ~ (The effectiveness of this conversion in terms of phosphorus removal can vary widely, depending on factors such as soil type and existing levels of phosphorus, types of grasses planted)		
	Feasibility of environmental setting	This solution would pass the HRA requirements for perpetuity but would require stakeholder agreements.	Feasibility of environmental setting	This solution would pass the HRA requirements for perpetuity but would require stakeholder agreements.		
Cessation of fertiliser / manure application	Cost	£1,274.37/ha/yr	Cost	£1,274.37/ha/yr		
	P removal	0.02 – 0.19 kg/ha/yr	P removal	0.02 – 0.19 kg/ha/yr		
	Feasibility of environmental setting	The total cessation poses practical and economic challenges for active agricultural operations, potentially affecting productivity and livelihoods. It is a temporary solution and would not pass all HRA requirements.	Feasibility of environmental setting	The total cessation poses practical and economic challenges for active agricultural operations, potentially affecting productivity and livelihoods. It is a temporary solution and would not pass all HRA requirements.		
Cover crops	Cost	£150/ha/yr.	Cost	£150/ha/yr.		

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	P removal	0.027kg/ha/yr (~30% removed based on the total arable land available)	P removal	0.114kg/ha/yr (~30% removed based on the total arable land available)		
	Feasibility of environmental setting	Highly suitable for arable grassland areas, aiding in reducing runoff and hence nutrient leaching. Is not a potential long-term solution so would not pass all HRA requirements.	Feasibility of environmental setting	Highly suitable for arable grassland areas, aiding in reducing runoff and hence nutrient leaching. Is not a potential long-term solution so would not pass all HRA requirements.		
Highway drainage (SuDS)	Cost	Estimated capital costs of £20/m ² – £40/m ² (would require 1 year monitoring survey)	Cost	Estimated capital costs of £20/m ² – £40/m ² (would require 1 year monitoring survey)	Dependent on P removal statistics	Dependent on P removal statistics
	P removal	No available data	P removal	No available data		
	Feasibility of environmental setting	This solution would be feasible based off the HRA requirements and is a long-term solution. Feasibility of establishing is dependent on the water company.	Feasibility of environmental setting	This solution would be feasible based off the HRA requirements and is a long-term solution. Feasibility of establishing is dependent on the water company.		
Installation of SuDS in new developments	Cost	Estimated capital costs of £20/m ² – £40/m ² (New developments will already have SuDS installation costed in)	Cost	Estimated capital costs of £20/m ² – £40/m ² (New developments will already have SuDS installation costed in)		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	P removal	20-100% removed of total P from new developments.	P removal	20-100% removed of total P from new developments.		
	Feasibility of environmental setting	Feasible in all new development areas and meets HRA requirements.	Feasibility of environmental setting	Feasible in all new development areas and meets HRA requirements.		
Retro-installation of SuDS in existing developments / urban areas	Cost	Estimated capital costs of £20/m ² – £40/m ²	Cost	Estimated capital costs of £20/m ² – £40/m ²	Potentially an option that is already in use	
	P removal	20-100% removed of total P from existing developments.	P removal	20-100% removed of total P from existing developments.		
	Feasibility of environmental setting	Feasible in all new development areas, would meet HRA requirements.	Feasibility of environmental setting	Feasible in all new development areas, would meet HRA requirements.		
Paddock management	Cost	Estimated £150/ha/yr.	Cost	Estimated £150/ha/yr.	Short to medium term solution.	Would only provide reduced long-term benefits to the wider catchment.
	P removal	0.07kg/ha/py (upper limit for lowland grazing)	P removal	0.08kg/ha/py (upper limit for lowland grazing)		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	Feasibility of environmental setting	<i>Feasible for only equine paddocks, which there are fewer hectares of land of across West Berkshire compared to the available land for other solutions.</i>	Feasibility of environmental setting	<i>Feasible for only equine paddocks, which there are fewer hectares of land of across West Berkshire compared to the available land for other solutions.</i>		

Table 5.3 Proposed waste water solutions RAG score for the Lambourn upper and lower catchment areas, reasons behind the RAG score have been highlighted in the feasibility comments column

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
Expedite planned improvements to treatment works	Cost	<i>No immediate costs, but Thames Water will expect reimbursement that can be sought via a further agreement.</i>	Cost	<i>No immediate costs, but Thames Water will expect reimbursement that can be sought via a further agreement. There are planned upgrades already due to take place in WRC of Chieveley within the lower catchment area</i>		
	P removal	<i>Expedite improvements scheduled for 2024. Approximate temporary mitigation achieved for each year improvements are expedited. East Shefford: 272.84 kg/yr</i>	P removal	<i>Expedite improvements scheduled for 2024. Approximate temporary mitigation achieved for each year improvements are expedited. Boxford: 110.81kg/yr Chieveley: 211.99 kg/yr East Shefford: 272.84 kg/yr</i>		

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	Feasibility of environmental setting	<i>Feasibility will depend on Thames water. Would not meet the perpetuity aspect of the HRA.</i>	Feasibility of environmental setting	<i>Feasibility will depend on Thames water. Would not meet the perpetuity aspect of the HRA.</i>		
Improvements to wastewater treatment works	Cost	<i>Thames Water estimate capital costs of £3.5M/ WwTW. Operational costs: £165,000 per year/WwTW. Although, this option is likely to be funded by nutrient credits.</i>	Cost	<i>Thames Water estimate capital costs of £3.5M/ WwTW. Operational costs: £165,000 per year/WwTW. Although, this option is likely to be funded by nutrient credits.</i>		
	P removal	<i>Fawley: 21 kg/yr for an effluent concentration of 2mg/l</i>	P removal	<i>Winterbourne: 17 kg/yr for an effluent concentration of 2mg/l</i>		
	Feasibility of environmental setting	<i>Feasible WwTW locations in the upper catchment and would meet the HRA requirements. Only applicable to treatment works not requiring improvements under TAL or WINEP. However, water companies are unlikely to commit to improvements to treatment works for nutrient benefits if the Environment Agency will force compliance for other determinants. Furthermore, water companies have no mechanism under the current OFWAT rules for</i>	Feasibility of environmental setting	<i>Feasible WwTW locations in the upper catchment and would meet the HRA requirements. Only applicable to treatment works not requiring improvements under TAL or WINEP. However, water companies are unlikely to commit to improvements to treatment works for nutrient benefits if the Environment Agency will force compliance for other determinants. Furthermore, water companies have no mechanism under the current OFWAT rules for</i>		

Project related

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
		<i>accepting developer contributions for improvements..</i>		<i>accepting developer contributions for improvements.</i>		
Installation of cesspools and capture outputs from private sewage systems	Cost	Capital costs: £3,000 to £6,000. Operational costs: £3,200 to £5,600 per year.	Cost	Capital costs: £3,000 to £6,000. Operational costs: £3,200 to £5,600 per year.		
	P removal	100% of private systems output	P removal	100% of private systems output		
	Feasibility of environmental setting	Would not be an option to bring in across a wide scale of the catchment and would only provide small amounts of P removal benefits in total. Meets the HRA requirements, but would likely only be used as a short-term solution.	Feasibility of environmental setting	Would not be an option to bring in across a wide scale of the catchment and would only provide small amounts of P removal benefits in total. Meets the HRA requirements but would likely only be used as a short-term solution.		
Improvements to package treatment plants / septic tanks	Cost	Capital costs: bespoke to plant size, up to £10,000 - £15,000. Maintenance costs of £400 to £600 per year.	Cost	Capital costs: bespoke to plant size, up to £10,000 - £15,000. Maintenance costs of £400 to £600 per year.		
	P removal	0.97 kg/yr	P removal	0.97 kg/yr		
	Feasibility of environmental setting	In order for the solution to pass the in-perpetuity test, there must be sufficient certainty that the system will	Feasibility of environmental setting	In order for the solution to pass the in-perpetuity test, there must be sufficient certainty that the system will be in place for the		

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
		<i>be in place for the duration of the development it is mitigating (i.e. 80 years) and that if it needs to be replaced at the end of its lifetime (e.g. 40 years), the future system is to the same effluent concentration or better. This will often require agreements to be made with mortgage lenders.</i>		<i>duration of the development it is mitigating (i.e. 80 years) and that if it needs to be replaced at the end of its lifetime (e.g. 40 years), the future system is to the same effluent concentration or better. This will often require agreements to be made with mortgage lenders.</i>		
Installation of portable treatment works	Cost	<i>Capital costs £10,000 to £100,000 (depending on size). Maintenance costs £1,000 to £5,000 per year.</i>	Cost	<i>Capital costs £10,000 to £100,000 (depending on size). Maintenance costs £1,000 to £5,000 per year.</i>		
	P removal	<i>0.5mg/l – depending on the area serviced this could be a small or significant removal.</i>	P removal	<i>0.5mg/l – depending on the area serviced this could be a small or significant removal.</i>		
	Feasibility of environmental setting	<i>The solution will not pass the in-perpetuity test. It is therefore a short-term solution with varying environmental feasibility depending on location.</i>	Feasibility of environmental setting	<i>The solution will not pass the in-perpetuity test. It is therefore a short-term solution with varying environmental feasibility depending on location.</i>		
Rectifying misconnections to combined systems	Cost	<i>£1.9 Million to £3.8 Million dependent on the plant size.</i>	Cost	<i>£1.9 Million to £3.8 Million dependent on the plant size.</i>		
	P removal	<i>10 kg/yr – varies based on the number of misconnections.</i>	P removal	<i>10 kg/yr – varies based on the number of misconnections.</i>		

Solution	Upper Catchment RAG	Upper Catchment Comment	Lower Catchment RAG	Lower Catchment Comment	Overall Ranking as a Temporary solution	Overall Ranking as a Permanent solution
	Feasibility of environmental setting	<i>Does not meet all the HRA requirements of feasibility, specifically that there is no evidence of the P-removal impacts. It is also difficult to identify location of misconconnections and opportunities are only likely to be identified on an ad-hoc basis. A full survey of potential properties would be prohibitively expensive.</i>	Feasibility of environmental setting	<i>Does not meet all the HRA requirements of feasibility, specifically that there is no evidence of the P-removal impacts. It is also difficult to identify location of misconconnections and opportunities are only likely to be identified on an ad-hoc basis. A full survey of potential properties would be prohibitively expensive.</i>		
Retrofit water saving measures in existing properties (local authority, registered providers, public buildings)	Cost	<i>£4000 per instalment</i>	Cost	<i>£4000 per instalment</i>		
	P removal	<i>Approximately 40l/person/day removal (Approximately 3 existing dwellings to every 1 new dwelling)</i>	P removal	<i>Approximately 40 l/person/day removal (Approximately 3 existing dwellings to every 1 new dwelling)</i>		
	Feasibility of environmental setting	<i>Feasible only at certain existing properties and dwellings, passes all HRA requirements.</i>	Feasibility of environmental setting	<i>Feasible only at certain existing properties and dwellings, passes all HRA requirements.</i>		
Incentivise commercial water efficiency	Cost	<i>Unknown</i>	Cost	<i>Unknown</i>		
	P removal	<i>No available data</i>	P removal	<i>No available data</i>		
	Feasibility of environmental setting	<i>Feasibility is dependent on the water company</i>	Feasibility of environmental setting	<i>Feasibility is dependent on the water company</i>		

5.3 West Berkshire preferred mitigation solution stages and timescales

Natural England has developed different stages of the life cycle of a mitigation solutions implementation. These five stages include; a feasibility assessment, technical development and initial consultation, design and consenting, construction and post-construction monitoring. Each of these stages have varying time scales that need to be considered before options are chosen.

Table 5.4 sets out the stages and timescales for mitigation solutions (from **Table 5.2** and **Table 5.3**) that scored a green or amber RAG score for an overall temporary or permanent solution. For Table 5.4 the mitigation options for nature-based solutions that were excluded include; Beetle banks, conversion of agricultural land to solar and cessation of fertiliser. For waste water solutions the excluded solutions included; Expedited planned WwTW improvements, improvements to WwTWs, installation of cesspools from private sewers, and retrofitting water saving efforts.

The time scales for each of the stages have been estimated based on previous case studies and estimations on similar solutions. For example, wet woodlands and willow buffer strips have similar requirements to that of the riparian buffer strips, and thus the timescales have been estimated using the riparian buffer strip time scales as a baseline. For specific mitigation solutions where the P-removal data is needed to be monitored for Natural England to develop an accurate understanding of the nutrient removal a solution is having a baseline monitoring survey must be conducted. Natural England “indicates that a minimum of a year’s baseline monitoring is necessary to confidently quantify credits that can be gained from the mitigation scheme to provide a strong understanding of nutrient cycling in the system”. The use of SuDS for highway drainage is one such solution that will require this baseline survey.

Table 5.4 Breakdown of tasks and timescales required to deliver preferred solutions for West Berkshire

Solution	Stage	Tasks	Timescales
Nature based mitigation solutions			
Riparian buffer strips and Willow Buffers	Initial Feasibility	<ol style="list-style-type: none"> 1. The screening of the catchment for suitable areas where buffer strips could be implemented within West Berkshire. This will use existing mapping. 2. Evaluation of suitable areas to identify highest priority land parcels. Areas are identified using the following criteria: <ol style="list-style-type: none"> a. Nutrient removal potential. b. Topography. c. Geology and Hydrology. d. Soil and sediment types. e. Hydrology and drainage. f. Flood risks. g. Protected sites and Invasive species. h. Current land use. i. Ownerships. j. Landscape and heritage. k. Public access and bird strike risk. l. Regulatory considerations and infrastructure. 	~ 4-6 weeks
	Technical development & initial consultation	<ol style="list-style-type: none"> 3. Engagement with landowners to gauge interest and willingness to participate in the scheme. 4. Detailed feasibility and refine the nutrient calculations based on site specific information. 5. Consultation with Natural England regarding proposed nutrient removal methodology which should be in line with the Riparian buffer strip framework. 	~ 8-11 weeks
	Design & consenting	<ol style="list-style-type: none"> 6. Design stage, likely to include: <ol style="list-style-type: none"> a. Site plans including; surface topography, vegetation type and cover, slope, soil type, livestock. b. Planting schedule. c. Construction methods statement (expect that they would not need planning consent). d. Maintenance schedule. <p>Note: There is a potential for high level surveys (e.g., Phase 1 Ecology Survey) to be needed at this stage, which may need to be undertaken in survey season (May-September).</p> <ol style="list-style-type: none"> 7. In tandem with 6: Enter legal agreements with landowner regarding: 	<p>~ 20-25 weeks*</p> <p>*This timescale assumes no planning permission is required</p>

Project related

Solution	Stage	Tasks	Timescales
		<ul style="list-style-type: none"> a. Leasing land identified as suitable for implementing buffer strips. b. Arrangements regarding future management and maintenance. <p>8. Gain approval by Natural England, likely to include the submission of the following documents:</p> <ul style="list-style-type: none"> a. Technical documents (i.e., technical reference sheet) for each site. b. Site plans. <p>9. Consult with Natural England regarding Riparian Buffer framework and award % of the maximum efficacy value that can be claimed.</p> <p>10. Identification of delivery partner. Using a “familiar face” in the catchment may be aid a good relationship with landowners.</p> <p>Note: if undertaking scheme specific monitoring instead of modelling, a minimum of a year’s baseline monitoring is necessary to quantify the nutrient credits that can be achieved.</p>	
	Construction	<ul style="list-style-type: none"> 11. Implementation/ construction of riparian buffer strips in agreed locations. 12. Validation of works carried out from council to Natural England (this could involve photographic evidence). After works have been validated, upfront Nutrient Credits can be released. 	~ 10-13 weeks
	Post-construction monitoring	<p>13. Post-implementation monitoring will be required to gain additional credits. Two surveys points are required (one upstream and one downstream) and a trend analysis required on concentrations, flow and potential time lags. Note: post-implementation monitoring can only achieve additional credits if baseline monitoring was also carried out.</p>	N/A
Wet Woodlands	Initial feasibility	<ul style="list-style-type: none"> 1. Screening of catchment for suitable areas where buffer strips could be implemented within West Berkshire. This will use existing mapping. 2. Evaluation of suitable areas to identify highest priority land parcels. Areas are identified using the following criteria: <ul style="list-style-type: none"> a. Nutrient removal potential. b. Topography. c. Geology and Hydrology. d. Soil and sediment types. e. Hydrology and drainage. f. Flood risks. g. Protected sites and Invasive species. h. Current land use. i. Ownerships. 	~ 4-6 weeks

Project related

Solution	Stage	Tasks	Timescales
		<ul style="list-style-type: none"> j. Landscape and heritage. k. Public access and bird strike risk. l. Regulatory considerations and infrastructure. 	
	Technical development & initial consultation	<ul style="list-style-type: none"> 3. Engagement with landowners to gauge interest and willingness to participate in the scheme. 4. Detailed feasibility and refine the nutrient calculations based on site specific information. 5. Consultation with Natural England regarding proposed nutrient removal methodology which should be in line with the Riparian buffer strip framework. 	~ 8-11 weeks
	Design & consenting	<ul style="list-style-type: none"> 6. Design stage, likely to include: <ul style="list-style-type: none"> a. Site plans including; surface topography, vegetation type and cover, slope, soil type, livestock. b. Planting schedule. c. Construction methods statement (expect that they would not need planning consent). d. Maintenance schedule. Note: There is a potential for high level surveys (e.g., Phase 1 Ecology Survey) to be needed at this stage, which may need to be undertaken in survey season (May-September). 7. In tandem with 6: Enter legal agreements with landowner regarding: <ul style="list-style-type: none"> a. Leasing land identified as suitable for implementing buffer strips. b. Arrangements regarding future management and maintenance. 8. Gain approval by Natural England, likely to include the submission of the following documents: <ul style="list-style-type: none"> a. Technical documents (i.e., technical reference sheet) for each site. b. Site plans. 9. Consult with Natural England regarding Riparian Buffer framework and award % of the maximum efficacy value that can be claimed. 10. Identification of delivery partner. Using a "familiar face" in the catchment may be aid a good relationship with landowners. Note: if undertaking scheme specific monitoring instead of modelling, a minimum of a year's baseline monitoring is necessary to quantify the nutrient credits that can be achieved. 	~ 20-25 weeks* *This timescale assumes no planning permission is required
	Construction	<ul style="list-style-type: none"> 11. Implementation/ construction of riparian buffer strips in agreed locations. 	~ 10-13 weeks

Project related

Solution	Stage	Tasks	Timescales
		12. Validation of works carried out from council to Natural England (this could involve photographic evidence). After works have been validated, upfront Nutrient Credits can be released.	
	Post-construction monitoring	13. Post-implementation monitoring will be required to gain additional credits. Two surveys points are required (one upstream and one downstream) and a trend analysis required on concentrations, flow and potential time lags. Note: post-implementation monitoring can only achieve additional credits if baseline monitoring was also carried out.	N/A
Reverting agricultural land to grassland or semi-wooded areas.	Initial feasibility	<ol style="list-style-type: none"> 1. Screening of catchment for suitable areas where arable land could be reverted to low fertiliser input grassland. 2. Evaluation of suitable areas to identify highest priority land parcels. Areas are identified according to the following criteria: <ol style="list-style-type: none"> a. Nutrient removal potential. b. Environmental constraints. c. Size of arable land package. d. Protected sites. 	~ 4-6 weeks
	Technical development & initial consultation	<ol style="list-style-type: none"> 3. Evaluation of initial feasibility to find priority areas where schemes can be implemented, must be on arable areas that have either had the land cultivated for at least 2 years and is identified on the Farm Environment Record (FER) is at risk of soil erosion or surface run off, or is an important site for buffering sensitive habitats. 4. Implementation strategy defined (e.g., using local authority enforcement or volunteers). 5. Legal agreements and Natural England approval of scheme. 	~ 8-11 weeks
	Design & consenting	<ol style="list-style-type: none"> 6. Design requirements are likely to include: <ol style="list-style-type: none"> a. Site plans. b. Planting schedule. c. Maintenance schedule. 7. In tandem with 6: Enter legal agreements with landowner regarding: <ol style="list-style-type: none"> a. Leasing land identified as suitable to revert and identifying the grass species to sow. b. Arrangements regarding future management and maintenance this includes ensuring that the following activities are not carried out: 	~ 20-25 weeks* *This timescale assumes no planning permission is required

Project related

Solution	Stage	Tasks	Timescales
		<ul style="list-style-type: none"> Use of pesticides, except for herbicides to weed wipe or spot treat injurious weeds, invasive non-native species, nettles, or bracken; Application of any manure or fertiliser between 15 August and 1 February; Application of any livestock manures with more than 100 kg of total nitrogen per ha per year, or, no more than 50kg per ha of total nitrogen per year (where there is no use of livestock manures); and, Supplementation of livestock feed except for mineral blocks (non-energy based). <p>8. Gain approval by Natural England. This is likely to require the submission of the following documents:</p> <ol style="list-style-type: none"> Technical documents (i.e., technical reference sheet) for each land area. Site plans for each arable land owner. 	
	Construction	<p>9. Implementation (planting).</p> <p>10. Validation of the works carried out from the Council to Natural England (this could involve photographic evidence). After the works have been validated Nutrient Credits can be released.</p>	~ 10-13 weeks
	Post-construction monitoring	<p>11. It is assumed there will be no requirement for post-construction monitoring.</p>	N/A
Cover Crops	Initial feasibility	<ol style="list-style-type: none"> Screening of catchment for suitable areas where cover crops could be implemented. This will use existing mapping. Evaluation of suitable areas to identify highest priority land parcels. Areas are identified using the following criteria: <ol style="list-style-type: none"> Nutrient removal potential and current nutrient uptake by soil. Environmental constraint. Current land use. Root depth and soil structure. 	~4-6 weeks
	Technical development & initial consultation	<ol style="list-style-type: none"> Evaluation of initial feasibility to find priority areas where schemes can be implemented. Implementation strategy defined (e.g., using Local Authority enforcement or volunteers). Legal agreements and Natural England approval of scheme. 	~ 8-11 weeks

Project related

Solution	Stage	Tasks	Timescales
	Design & consenting	6. Design requirements are likely to include: <ul style="list-style-type: none"> a. Site/ farm plans. b. Planting windows and rotation planning schedule. c. Selection of a cover crop species for optimal growth and removal. 7. In tandem with 6: Enter legal agreements with landowner regarding: <ul style="list-style-type: none"> a. Leasing land identified as suitable for growth of cover crops. b. Arrangements regarding future crop rotation. 8. Gain approval by Natural England, likely to include the submission of the following documents: <ul style="list-style-type: none"> a. Technical documents (i.e., technical reference sheet) for each site. b. Site/farm/crop plans. 	~ 20-25 weeks* Includes a baseline survey to be carried out in tandem with legal documentation. *This timescale assumes no planning permission is required
	Construction	9. Cover crops should be planted ahead of the wetter months (Autumn) and planting planned according to the designated crop rotation schedule. 10. Validation of works carried out from the Council to Natural England (this could involve photographic evidence). After works have been validated Nutrient Credits can be released.	~2- 3 weeks* *Depending on the size of the field and weather conditions
	Post-construction monitoring	11. There is a likelihood that water quality monitoring will be required by Natural England.	Min 52 weeks
Paddock Management	Initial feasibility	1. Finding suitable areas within catchment – mapping exercise and landowner conversations to establish who owns an equine paddock in West Berkshire, where they are located and how to contact them. 2. Feasibility assessment to identify shortlist sites, including analysing: <ul style="list-style-type: none"> a. Nutrient removal potential. b. Topography. c. Appropriate environmental setting d. Initial approval from landowners/ paddock owners. 	~ 8-10 weeks
	Technical development & initial consultation	3. Evaluation of feasibility to identify priority sites/ paddocks for P removal. 4. Initial consultation with Natural England.	~ 4-6 weeks
	Design & consenting	5. Design stage, likely to include: <ul style="list-style-type: none"> a. Site plans. b. Maintenance schedule. 6. In tandem with 6: Enter legal agreements with landowner regarding: <ul style="list-style-type: none"> a. Leasing equine paddocks identified as suitable. 	~ 15-20 weeks

Project related

Solution	Stage	Tasks	Timescales
		<ul style="list-style-type: none"> b. Arrangements regarding future management and maintenance. 7. Gain approval by Natural England, likely to include the submission of the following documents: <ul style="list-style-type: none"> a. Technical documents (i.e., technical reference sheet) for each site. b. Site plans. 	
	Construction	<ul style="list-style-type: none"> 8. Paddock management plans undertaken. 9. Validation of works carried out from council to Natural England – could involve photographic evidence. After works have been validated Nutrient Credits can be released. 	~ 1-2 weeks
	Post-construction monitoring	<ul style="list-style-type: none"> 10. It is assumed there will be no requirement for post-construction monitoring. 	N/A
Waste water mitigation solutions			
Upgrading or replacing existing private sewage package treatment plants	Initial Feasibility	<ul style="list-style-type: none"> 1. Call for sites to identify potential homeowners in the catchment (this may include utilising social media, websites, letter drops). This stage involves: <ul style="list-style-type: none"> a. Liaison with the Environment Agency and water companies to identify hotspot areas for upgrades or replacement of PTPs. b. Review of the consented discharges list with Environment Agency. 	~ 8-12 weeks
	Technical development & initial consultation	<ul style="list-style-type: none"> 2. Screening potential sites that have come forward against the small-scale discharge thresholds. 3. Shortlisting and evaluation of sites. This step involves evaluating which sites are likely to provide the greatest nutrient removal and ease of implementation. 4. Identify delivery partner. This will likely be an external contractor and therefore an agreement on the type of works to be carried out and specific PTP models to be installed should be outlined. 	~ 25-30 weeks* *timescales may vary subject to the council's subcontractor procurement process (task 7)
	Design & consenting	<ul style="list-style-type: none"> 5. Legal agreements and Natural England approval gained. At this stage there is still some uncertainty regarding agreements, and the current understanding is that security with mortgage lenders would be needed. 6. Development of design plans, including home visits (likely performed by an external contractor), ordering of PTPs, and supply of PTPs. 	~ 8-20 weeks per task* *timescales assume PTPs cannot be implemented using Environment Agency's general binding rules
	Construction	<ul style="list-style-type: none"> 7. Implementation of upgrades/ replacements of PTPs in agreed locations. 8. Validation of works carried out from the Council to Natural England (this could involve photographic evidence). After works have been validated Nutrient Credits can be released. 	~ 10-14 weeks

Solution	Stage	Tasks	Timescales
	Post-construction monitoring	9. It is assumed there will be no need for monitoring post-construction, but post-construction observations will be carried out to ensure maintenance is carried out according to the manufacturer's requirements across the engineering life time (80 years).	N/A
Highways drainage/ Sustainable drainage systems	Initial feasibility	1. Finding suitable areas within catchment – mapping exercise to identify suitable areas. This should consider high erosion risk areas, known problem areas and an understanding of existing infrastructure. 2. Feasibility assessment to identify shortlist sites, including analysing: a. Nutrient removal potential. b. Existing SuDS. c. Flow volumes. d. Upstream sources of nutrients.	~ 8-10 weeks
	Technical development & initial consultation	3. Evaluation of feasibility to identify priority sites. 4. Initial consultation with Natural England.	~ 4-6 weeks
	Design & consenting	5. Development of design plans and management & maintenance plans. These will require Natural England approval. 6. Finalisation and evaluation of designs.	~ 15-20 weeks
	Construction	7. Construction of SuDS. 8. Validation of works carried out from the Council to Natural England – could involve photographic evidence. After works have been validated Nutrient Credits can be released.	~ 15-20 weeks
	Post-construction monitoring	9. There is a likelihood that water quality monitoring will be required by Natural England.	min 52 weeks
Retro-installation of SuDS in existing developments	Initial feasibility	1. Screening of existing developments for existing drainage structures and availability for retro-installation of SuDS. 2. Feasibility assessment to identify shortlist sites, including analysing: a. Nutrient removal potential. b. Flow volumes. c. Existing SuDS and features (swales, rain gardens, detention basins). d. Upstream nutrients for baseline water quality. e. Site topography.	~8 -10 weeks

Project related

Solution	Stage	Tasks	Timescales
	Technical development & initial consultation	3. Evaluation of feasibility to identify priority sites. 4. Initial consultation with Natural England. 5. Initial consultation with Thames Water and development stakeholders.	~4-6 weeks
	Design & consenting	6. Development of conceptual SuDS design plans and management & maintenance plans. These will require Natural England approval. This is likely to include. f. Selecting appropriate components to form treatment trains. g. Consider integrating SuDS into the landscape or urban fabric for multifunctional benefits. h. Public stakeholder engagements. i. Maintenance schedule. 7. Determination of nutrient removal potential, using the CIRIA SuDS guidance for phosphorus removal. 8. Finalisation and evaluation of designs.	~15-20 weeks
	Construction	9. Construction of SuDS in accordance with best-practise.	~ 5 - 30 weeks* *Depending on the number of available retro-installations available.
	Post-construction monitoring	It is assumed there will be no requirement for post-construction monitoring.	N/A

5.4 Delivery of preferred mitigation solutions

Each mitigation solution can be led by the same or a different authority. This section sets out the different options of mitigation solution delivery and the aspects that need to be considered for their delivery by each authority.

5.4.1 Developer led mitigation

Under this option, developers would be solely responsible for delivering the mitigation needed to offset the proposed development. On-site measures, e.g., SuDS, are likely to be primarily delivered by developers who would identify, finance, and deliver the mitigation solutions. Off-site measures could either be delivered by developers (as for on-site mitigation) or through purchasing established mitigation credits from other landowners.

The mitigation measures must comply with the Habitats Regulations, and developers and/or landowners should be guided by the Solutions Report which presents and assesses suitable mitigation options. Some of the solutions suggested (e.g., SuDS for highway run off management and nature-based solutions such as riparian buffer strips) could be delivered by private developers and landowners.

Developer led mitigation is likely to be more suitable for larger developments (i.e. >50 dwellings) that have the financial resources, space and capabilities for delivery. Identifying suitable off-site mitigation land is also likely to require relationships with landowners across the catchment areas.

Additionally, identifying and implementing specific solutions will require capital expenditure for design and consultancy fees and land purchase/rent. Smaller developments (i.e. <50 dwellings) and particularly windfall developments are unlikely to have the space to deliver on-site mitigation nor the ability to deliver off-site mitigation. To overcome this, smaller developers could work in partnership to deliver mitigation by pooling resources and funding.

In order to minimise the risks associated with developer-led mitigation, developers could partner with organisations that have experience in delivering and maintaining schemes. These organisations include private consultancies, non-governmental organisations (e.g., Wildlife Trust, Rivers Trusts) or private entities such as water companies.

There is also the option to include 'step-in rights', where the Council or another third-party (e.g. Environment Agency) may acquire the scheme if it is not maintained appropriately. An appropriately designed 'step-in' arrangement would be needed which should ensure there are enough funds to maintain the solution in perpetuity.

The Local Authority, or a body acting on their behalf, is likely to have a role to play in this option by validating and securing proposed schemes and carrying out associated monitoring on an ongoing basis. Costs for this should be retrieved during the planning process.

Developers may find difficulty in the administration of nutrient credits, particularly if selling excess nutrient credits to other developers. There also comes a risk that if a singular scheme does not perform, it cannot be underwritten by a portfolio of other solutions.

5.4.2 Local Authority mitigation

A Local Authority strategic scheme would allow developers to purchase mitigation credits in a wider mitigation scheme. The mitigation scheme would be primarily developed by the Local Authority and would

utilise off-site mitigation solutions. Combining financial contributions would allow the Local Authority to deliver 'strategic' scale mitigation measures.

As mitigation solutions tend to have fixed costs in terms of design and consent mechanisms, it is often cheaper to deliver one larger 'strategic' solution rather than multiple smaller solutions. The Local Authority could also look to partner with third-party organisations to implement and manage the schemes on their behalf.

A Local Authority led scheme will provide a strategic mechanism for small developments to achieve mitigation which would otherwise be unviable based on their resources and capabilities; much of West Berkshire are more rural than urban. This option would acquire financial contributions through a credit-based scheme and the purchase of credits would be used to secure these offsite mitigation schemes. This method has been utilised in other catchments with nutrient neutrality issues.

One advantage of a Local Authority-led scheme over a developer-led scheme is that it would give the Local Authority direct oversight of the functioning and maintenance of the mitigation scheme, and therefore further certainty regarding the delivery. A Local Authority scheme can also be underwritten by a portfolio of solutions to ensure that someone takes responsibility for addressing any future shortfalls in credits delivered. However, a precautionary approach should be taken by underestimating phosphate removal rates for solutions, to ensure that at the very least, the required mitigation is delivered.

Should the demand for credits outweigh supply, there is the potential that credits could be locked up in projects that are not able to progress upon receiving the credits. This could occur where a development needs credits assigned to progress through the planning process but is not likely to be built out for some time. This could result in some developments which are more advanced in the planning process and in a position to construct, failing to acquire credits and causing delay. A Local Authority led scheme can have greater control over this than any of the other options presented. Limiting forward buying will help to reduce price volatility from short-term demand and supply and allow credits to be allocated to projects where there is an immediate requirement. Therefore, it would be useful to incorporate a mechanism into the strategic schemes to ensure that the credits obtained are used to immediately unlock development rather than being banked for the future. This could potentially include a time limit for their use, after which the credits must be returned so that they are available for use by other developers.

A Local Authority scheme would also be able to impose conditions that mitigation credits can only be acquired once all on-site mitigation options (e.g., SuDS) have been explored and exhausted. This will prevent developers relying purely on off-site mitigation options.

It is anticipated that any payments to landowners for delivering mitigation schemes would be paid in lump sums over a pre-defined timescale. Upfront payments will be required to cover capital expenditure, with the remaining monies paid at a later date (e.g., at 5 year intervals).

In the case that a development will be completed in stages, then credits could be secured over multiple years, as opposed to all-in-one year. However, it is likely to be necessary to ensure that any scheme includes a mechanism to provide developers with assurances in managing risks and securing the credits they require for the whole multi-phase development at a reasonable price. Further measures which could be implemented, include establishing viability checks of developments to ensure credits are not unnecessarily locked up. A Local Authority led strategic scheme will also have greater control on any price volatility should there be a high demand for credits.

5.4.3 Third-party schemes

A third-party credit scheme would work in a similar way to a Local Authority scheme but would be delivered and managed by a single, private entity. A third-party scheme would not offer the same level of certainty over the deliverability of mitigation measures as a Local Authority scheme and there would be limited control over releasing credits to the developments most in need. It is also likely that there would be greater price volatility. At present and third-party entity operating in West Berkshire would have to be identified.

5.4.4 Local Authority nutrient trading

A Local Authority controlled nutrient trading platform would involve establishing an exchange market in which credits are tradeable between private mitigation schemes and developers. The platform would create mechanisms for landowners and developers to engage with each other. The Local Authority would act as the market operator and once the platform has been established, they would have minimal input other than validating schemes and securing mitigation. During the initial trading rounds, more support from the Local Authority would be required to ensure market rules are met and legal agreements are appropriate.

As the Local Authority would be the market operator, this would allow some control over who can receive credits and over price volatility through market rules. Similarly, the trading platform would give the Local Authority oversight of the functionality and maintenance of the mitigation scheme, and therefore have further certainty regarding the delivery.

There are limited examples of established local authority trading platforms in other catchments with nutrient neutrality issues. Many of the trading platform available are either at the development or pilot stage and rely heavily on third-party input (see below). As a result, there is likely to be a large financial burden on the Local Authority to establish a scheme which would then also be likely to take many years to become fully operational.

To be successful, a trading platform will need input from the following:

- Market operator – to oversee the entire trading platform;
- Landowner engagers – ideally with experience and contacts within the upper and lower catchment;
- Management system designer – to establish the management system and test the platform;
- Economic and policy team - to design the market settlement process; and
- Communications team - to support market information and communications.

5.4.5 Third-party nutrient trading

A third-party trading platform would operate in a similar way to a Local Authority trading platform but would be controlled and managed by a private entity (or consortium) that would act as the market operator. Example schemes include the Wessex Water Entrade Somerset Levels and Moors trading platform and the Solent nutrient trading pilot study. The Solent pilot study is also exploring how additional environmental benefits may be delivered, such as carbon pollution reduction, or biodiversity gains.

Whilst a third-party trading platform would work closely with Local Authorities, Natural England and the Environment Agency, it would not offer the same level of security on the deliverability of mitigation measures as a Local Authority scheme would.

There are currently no private entities or consortiums operating a nutrient trading platform in the West Berkshire catchment areas. However, should the Solent nutrient trading pilot be successful, there is the potential that this could be established in other catchments.

5.5 Potential future options

Emerging future options are potential solutions which are in the initial stages of data gathering and therefore lack information required to determine whether they fulfil the Habitat Regulations mitigation solutions criteria. The non-exhaustive list of potential future options is based on the Natural flood management measures guide from the Eden rivers trust (2018) that lays out potential management methods using three levels of interventions that are based on complexity, consultation requirements, and costs. Level 1 interventions are generally simple, low-cost measures that can be easily implemented without significant consultation. Level 2 interventions require more planning and possibly consent, involving medium-cost measures. Level 3 interventions are the most complex and costly, targeting specific locations within a catchment and usually requiring design, planning permission, and specialized contractors. West Berkshire could explore a range of innovative interventions to further enhance nutrient mitigation strategies and provide additional flood resilience in the region. These include the following;

Potential Level 1 Interventions

- Cross slope tree planting is a method of woodland creation that could be considered in combination with woodland and willow creation which is discussed in **Table 5.2**. The cross-slope design strengthens stream banks and reduces erosion and siltation, increasing the amount of pollution draining into water courses.

Potential Level 2 Interventions

- Bunds are low earth mounds that are built following the contour of the slope. Water is held in a detention basin by the bund and allowed to disperse through a combination of infiltration into the soil, evaporation, and slow release (for example through a small pipe or filter material). This in turn reduces the amount of groundwater run off entering the catchment and reduces agricultural pollution entering water systems.
- Wooded dams, ponds and shallow scrapes are additional nature-based methods of preventing runoff entering water systems. They also provide potential areas of resistance during flood events and drought periods to the land. These methods however do slowly drain back into the water systems so do not provide a 100% removal solution and just slow down the nutrient supply rather than removing nutrients.

Potential Level 3 Interventions

- Stabilising and revegetation blanket bogs stores high amounts of carbon and can act as a sponge to water runoff, decrease erosion and store away phosphorus and nitrogen pollution. They also provide a biodiversity benefit for moorland species. However, they can only be implemented in areas with appropriate bog areas.
- Water companies utilise reverse osmosis via salinity solutions. Trial periods are currently underway in Somerset and the solution may emerge as a viable temporary solution.

6 References

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Appendix 7 – Housing Background Paper (Jan 2023)

West Berkshire Council

Local Plan Review 2022-2039 Proposed Submission (Regulation 19)

Housing Background Paper

January 2023

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1. Background

- 1.1. The purpose of this document is to explain the background to the housing policies that are contained within the Proposed Submission West Berkshire Local Plan Review to 2039 (LPR). It deals with strategic policies such as the housing requirement, affordable housing and strategic site allocations, as well as non-strategic site allocations and development control policies that set the criteria for considering and determining planning applications.
- 1.2. This Housing Background Paper includes a section on national policy concerning housing and also refers to recent government proposals. It does not include details of sites that have been submitted or proposed for allocation as this is covered through the Housing and Economic Land Availability Assessment (HELAA)¹, Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)², and Site Selection Methodology Paper³.

¹ Housing and Economic Land Availability Update (January 2023):

<https://www.westberks.gov.uk/helaa>

² Sustainability Appraisal / Strategic Environmental Assessment for the West Berkshire Local Plan Review Proposed Submission (November 2022): <https://www.westberks.gov.uk/local-plan-evidence>

³ Site Selection Methodology Paper (January 2023): <https://www.westberks.gov.uk/local-plan-evidence>

2. Housing need and requirement

a. National Policy

- 2.1. A revised version of the National Planning Policy Framework (NPPF) was published in July 2021⁴. The NPPF sets out the Government's policies to support the achievement of sustainable development. The planning system has three overarching objectives, economic, social and environmental, which should be delivered through the preparation and implementation of plans. Policies should play an active role in guiding development towards sustainable solutions, taking account of local circumstances and reflecting the character, needs and opportunities of each area.
- 2.2. Several policies in the NPPF relate explicitly to issues of overall housing supply:
- Paragraph 60: to support the objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
 - Paragraph 61: to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
 - Paragraph 74: strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.
- 2.3. The NPPF is also supported by more detailed guidance in the Planning Practice Guidance (PPG)⁵.

b. Local Policy

(i) Core Strategy Development Plan Document (2012)

- 2.4. The Core Strategy⁶ was adopted in 2012 and was tested in examination for conformity with the policies in the original 2012 NPPF. Policy CS1 (Delivering New Homes and Retaining the Housing Stock) established an overall housing requirement for the period 2006 – 2026 of at least 10,500 net dwellings, an average of at least 525 dwellings per annum (dpa).
- 2.5. This housing requirement in the Core Strategy was not informed by a local housing need assessment as is now required. The requirement was set out in the South East Plan to which the Local Plan had to be in general conformity. The Inspector was clear that, before any review of the housing requirement, an update of the Strategic Housing Market Assessment (SHMA) should be undertaken in co-operation with neighbouring authorities within the Housing Market Area (HMA). This would

⁴ National Planning Policy Framework (July 2021):

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵ Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁶ West Berkshire Core Strategy Development Plan Document (July 2021):

<https://www.westberks.gov.uk/corestrategy>

establish the 'objectively assessed need' (OAN) as required in the, then newly published, 2012 NPPF.

- 2.6. The SHMA was published in 2016⁷, but the methodology for assessing housing need was changed in an updated version of the NPPF that was published in 2018⁸.

- 2.7. The review of the housing requirement is now taking place through the LPR.

(ii) *West Berkshire Housing Strategy 2020 to 2036*

- 2.8. The Housing Strategy⁹, which was adopted in March 2021, sets the Council's approach for delivering strategic housing priorities, and it details a range of actions that the Council intends to take in partnership with relevant partners and stakeholders.

- 2.9. One of the priorities of the Strategy is to enable every resident in the district to have access to a home that meets their needs, and in order to deliver this it is identified that the Council will engage with landowners and developers to deliver the level of new homes as required through the Local Plan.

c. Local Housing Need (LHN)

- 2.10. In July 2018, the Government published an updated version of the NPPF. This stated that to determine the minimum number of homes needed, strategic policies should be informed by a LHN assessment, conducted using the standard method in national planning guidance. This remains at paragraph 61 in the July 2021 update of the NPPF.

- 2.11. The LHN figure is based on the Office for National Statistics (ONS) household projections, published every 2 years by the ONS, with an additional uplift to reflect the affordability of the area every year.

- 2.12. When the LHN was first introduced, the PPG referred to the need to use the most recently published set of household projections. However, when the ONS published the 2016 based household projections on 20 September 2018, it became clear that across England, these resulted in the national minimum annual housing need, calculated using the standard method, falling from approximately 269,000 homes to approximately 213,000. This was significantly below the Government commitment to enable the housing market to deliver 300,000 homes a year on average by the mid-2020s. In response to this the Government carried out a consultation on options for changing the standard method and, in February 2019, changed the methodology to the use of the 2014-based projections as the demographic baseline. This was seen as a short term solution with a review of the formula to take place over the next 18 months.

- 2.13. In August 2020 the Government published a consultation on changes to the current planning system which included a proposal to amend the standard method to ensure that it delivered a number nationally that was consistent with the commitment to plan for the delivery of 300,000 homes a year by targeting more homes into areas where

⁷ Berkshire (including South Bucks) Strategic Housing Market Assessment (February 2016): <https://www.westberks.gov.uk/shma>

⁸ Objectively Sensitivity Testing – Western Berkshire Housing Market Area (March 2018): <https://www.westberks.gov.uk/shma>

⁹ West Berkshire Housing Strategy 2020-2036: <https://www.westberks.gov.uk/housingstrategy>

they are least affordable. This proposed methodology, often referred to as 'the mutant algorithm', attracted significant objections. In April 2021 the Government published its response. The standard method was retained as it was, other than for Greater London and the other 19 most populated urban centres in England (which include Reading) where a 35% uplift to the number generated by the standard method was to be applied. There was therefore no change to the LHN for West Berkshire.

- 2.14. Details of the formula and data to be used to calculate the local housing need figure are set out in the Housing and Economic Needs Assessment section of the Planning Practice Guidance (PPG)¹⁰, however a brief summary is provided in paragraphs 2.15 and 2.16 below. The resultant figure changes annually as the period of the household projection is rolled on a further year and updated affordability ratios are applied. The updated 2021 NPPF has no effect on the standard methodology.
- 2.15. The PPG in paragraph 004 (reference ID: 2a-004-20190220) states that the calculation of the LHN should calculate the projected average annual household growth over a 10 year period. This should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period. Therefore at the present time the period is 2022 - 2032. This will change year on year, along with the affordability ratios until the Local Plan Review is submitted to the Secretary of State for examination.
- 2.16. As aforementioned, the calculation of the LHN also requires an adjustment to take account of market signals using "median affordability ratios". The median affordability ratios, which compare the median house prices to median workplace earnings for each local authority in England are published annually in the spring by the ONS. In March 2022 the new set of ratios were released.
- 2.17. Using the 2014-based household projections (released September 2016, over the period 2022-2032), and an uplift based on the ratio of house prices to workplace-based earnings (2021 affordability ratio, published March 2022), the current LHN for West Berkshire for 2022 is **513 dwellings per annum**. The calculation is set out in Table 2.1 below.

¹⁰ PPG Housing and Economic Needs: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Table 2.1: Calculating the LHN

Step 1: Setting the baseline	
Projected household growth 2022 -2032 of 3,777, an annual average of 378 households per annum ¹¹	378 dpa
Step 2: Adjustment to take account of market signals	
Median workplace-based affordability ratio 2021 ¹²	9.73
Adjustment factor = $((\text{Local affordability ratio} - 4) / 4) \times 0.25 + 1$	1.339
Minimum annual local housing need figure = (adjustment factor) x projected household growth = $(5.73/4) \times 0.25 + 1 = 1.4325 \times 0.25 + 1 = 1.358125$	509 dpa
Step 3: Capping the level of any increase	
There is no need for a cap on the West Berkshire figure as the local need figure is less than 40% above the average annual housing requirement set out in the most recently adopted strategic policies (policy CS1 of the Core Strategy)	
Local Housing Need	513 dpa

- 2.18. A housing need of 513 dpa is close to the Core Strategy requirement of 525 dpa. It should be noted that the figure will be subject to periodic change. It will vary annually as the updated affordability ratios are published, usually in March, and again potentially every two years when new household projections are published, depending on government review of the methodology.

d. The Housing Requirement

- 2.19. It is important to clarify that the LHN is not necessarily the same as the housing requirement in the development plan.
- 2.20. The housing and economic need assessment section of the PPG outlines circumstances where it may be appropriate to plan for a higher number. These include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:
- Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate extra growth
 - Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.
- 2.21. The guidance also says that there may, occasionally also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment (SHMA)) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard method suggests.

¹¹ According to 2014-based Household Projections Live Tables; Table 406. See <https://www.gov.uk/government/collections/household-projections>

¹² According to House price to workplace-based earnings ratio for 2021 (released March 2021). See <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

- 2.22. The first two bullet points above are not circumstances currently applicable to West Berkshire. There are no growth strategies with funding in place that could be considered deliverable nor major planned infrastructure improvements.

(i) Unmet need from other local authorities

- 2.23. In relation to unmet need from other authorities, Reading Borough Council have identified a shortfall of 230 dwellings that is anticipated to arise in the later part of their current Local Plan period (the plan considers the period through to 2036). The local authorities which make up the Western Berkshire Housing Market Area (Bracknell Forest, Reading, West Berkshire, and Wokingham) have agreed a Statement of Common Ground for the purposes of Local Plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the Berkshire SHMA, not by any alternative calculations of need.
- 2.24. Reading have identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises.
- 2.25. No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire Housing Market Area.

(ii) SHMA

- 2.26. The LHN assessment effectively replaced the calculation of objectively assessed need (OAN) in the SHMA. The Berkshire SHMA was published in February 2016 and assessed the need as 665 dpa. This assessment included an adjustment to meet economic-led need, which no longer forms part of the standard method calculation. The assessment of OAN was updated in March 2018 in a sensitivity assessment using more recent household (2014-based) and economic projections and assessed the need as 600 dpa.

(iii) The housing requirement for West Berkshire

- 2.27. It is considered that a number higher than the current LHN in West Berkshire should be planned for. The reasons for this are:
- The NPPF objective to boost the supply of housing. The LPR should aim to boost supply above the minimum requirement in the existing Core Strategy which was 525 dpa.
 - The most recent objectively assessed need in the OAN Sensitivity Testing report of March 2018 was 600 dpa. Though the methodology has been superseded and it is no longer a recent study, it remains a consideration.
 - The need for flexibility as the impact of annual changes to the LHN, as a result of the rolling forward of the time period covered by the household projections and the updating of the affordability ratio, is uncertain.
 - The need for flexibility to allow for phasing issues and for an element of non-delivery of sites.

- 2.28. The Regulation 18 consultation published in November 2018 made a case for retaining flexibility by using a range for the housing requirement. A range from 551 to 631 dwellings per annum was proposed and it was considered that this would accommodate the LHN using the Government's revised standard method that had been out to consultation at the time of the consultation (551 dwellings) and the existing LHN at the time of 631 dwellings.
- 2.29. The approach of using a range was continued in the Regulation 18 consultation on the emerging draft LPR that was published for consultation in December 2020. When considering what range to use, a number of different growth scenarios were considered as was the additional supply needed to meet these growth scenarios. These are set out in Table 2.2 below:

Table 2.2: Overall housing requirement using different growth scenarios

Dwellings per annum	Housing requirement 2019 - 2036	Existing Supply	Additional Requirement
520 dpa (2019 LHN)	8840	8,657	183
525 dpa	8925	8,657	268
550 dpa	9350	8,657	693
600 dpa	10,200	8,657	1,543
620 dpa	10,540	8,657	1,883
625 dpa	10,625	8,657	1,968
650 dpa	11,050	8,657	2,393

- 2.30. As Table 2.2 shows, the additional requirement associated with the LHN would be less than 200 dwellings in total. As this was a very low figure, it was considered that it would be a high risk strategy to plan for only the LHN. Instead it was proposed to plan for more than the 2019 LHN, and officers felt that a range of 520 to 620 dpa was appropriate. This would equate to a total additional requirement of between 183 to 1,543 dwellings over the plan period.
- 2.31. At a meeting of Planning Advisory Group (an officer and Member working group established to support the execution of the Council's function relating to the development of the Local Plan and associated documents) on 11 May 2020, Members agreed to the use of a range, but felt that 620 was high given the uncertainty around the delivery of the Sandleford Park strategic site (an allocation within the Core Strategy). Members commented that previous Inspectors had vindicated a middle figure preference for new developments and proposed that the upper end of the range be around a 10% increase on the 2019 LHN (570 dwellings per annum). Members voted in favour of this revised figure.
- 2.32. It is considered that this approach is still appropriate for the proposed submission Regulation 19) LPR, and whilst the use of a range is not mandatory, it is common practice.
- 2.33. The lower end of the range used will continue to be the minimum requirement which would meet the LHN. The upper end of the range will however be the LHN with an added 5% buffer. The decision to reduce the buffer from 10% to 5% is considered to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district. The Written Ministerial Statement issued by the Secretary of State on 5 December 2022 sets out that the

LHN is “...an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area...”. The letter continues by stating in respect of genuine constraints that “...local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk.”

- 2.34. It is also considered to be more in line with the LHN trend over time (see Table 2.3 below), while still providing flexibility.

Table 2.3: Annual LHN in West Berkshire 2018 to 2022

2018	2019	2020	2021	2022
631	551	520	509	513

- 2.35. Table 2.4 below shows the LPR housing requirement range that will be used in the proposed submission (Regulation 19) LPR):

Table 2.4: LPR housing requirement range

Lower end of range: 2022 LHN	513 dwellings per annum 8,721 dwellings for the period 1 April 2022 to 31 March 2039
Upper end of range: 2022 LHN + 5%	538 dwellings per annum 9,146 dwellings for the period 1 April 2022 to 31 March 2039

- 2.36. The Council would plan to meet the upper end of the range in an effort to boost supply and ensure there is built in flexibility.

3. Housing Supply

3.1. Several sources will ensure a continuous supply of land for housing across the plan period. These include:

a. Retained allocations from the adopted Local Plan (Core Strategy and Housing Site Allocations Development Plan Document (DPD)) and Stratfield Mortimer Neighbourhood Development Plan

3.2. The plan period of the LPR overlaps with the previous plan period of 2006 to 2026. Account therefore needs to be taken of sites that have already been allocated in the adopted Core Strategy DPD, the Housing Site Allocations DPD, and Stratfield Mortimer Neighbourhood Development Plan (NDP).

3.3. The Council monitors annually the development progress of sites which are allocated in the Local Plan and/or have planning permission. The base date of the monitoring is 31 March, and at 31 March 2022, there were 2,652 units outstanding. These sites are included within the housing trajectory (including phasing of sites) at Appendix 2.

b. Allocations in the current Local Plan which are not being retained

3.4. Several sites within the Core Strategy DPD and Housing Site Allocations DPD are not being retained as allocations in the LPR due to development being at an advanced stage of construction. Nonetheless the outstanding units will contribute in the short term to the housing supply. These sites are included within the housing trajectory (including phasing of sites) at Appendix 2.

c. Existing planning commitments on unallocated sites

3.5. Existing permissions for housing on unallocated sites will also contribute to the supply. At 31 March 2022 there were 1,958 units that had planning permission or prior approval for permitted development. These sites are included within the housing trajectory (including phasing of sites) at Appendix 2.

d. Existing planning commitments for communal accommodation (Use Class C2)

3.6. The housing supply and delivery section of the PPG (paragraph 035, reference ID: 68-035-20190722) requires local planning authorities to “*count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply.*” The Housing Delivery Test Rulebook¹³ gives the ratio for communal accommodation based on the national average number of adults in all households as 1.8 based in the 2011 Census. For example a 90 bed care home would equate to 50 net dwellings ($90 / 1.8 = 50$).

3.7. The housing trajectory (including phasing of sites) in Appendix 2 includes the existing permissions for residential institutions (C2 use Class) which were outstanding at 31 March 2022.

e. Small site windfall allowance

3.8. Windfalls are defined in the NPPF glossary as “*sites not specifically identified in the development plan.*” The NPPF at paragraph 71 allows an allowance to be made for

¹³ Housing Delivery Test Rulebook (July 2018): <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

windfall sites as part of anticipated supply, provided there is compelling evidence that they will provide a reliable source of supply. The paragraph specifies that “*any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*”

- 3.9. The Council has included an allowance for windfalls in the calculation of the 5 year housing land supply and considers there is a clear case for an allowance for the longer plan period. As shown in Table 3.1 below, over the current plan period so far (2006-2022), an average of 383 residential units each year have been completed on land that has not been identified in the development plan. The vast majority of these are on previously developed land within settlement boundaries. Settlement boundaries have been defined to identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.

Table 3.1: Net windfall completions (April 2006 – March 2022)

Monitoring Year	Large non-allocated sites (10 or more units and 1ha or more	Medium non-allocated sites (10 or more units and under 1 ha)	Small non-allocated sites (less than 10 units)	Total non-allocated sites
2006/07	313	159	202	674
2007/08	216	33	198	447
2008/09	100	217	161	478
2009/10	25	99	115	239
2010/11	40	46	113	199
2011/12	5	31	126	162
2012/13	223	211	118	552
2013/14	102	103	125	330
2014/15	-24	135	245	356
2015/16	40	277	125	442
2016/17	122	117	163	402
2017/18	40	139	134	313
2018/19	25	158	139	322
2019/20	27	113	109	249
2020/21	347	71	87	505
2021/22	122	236	95	453
Annual Average 2006 - 2022	108	134	140.9	383

- 3.10. The current Local Plan does not allocate any sites within settlement boundaries as the principle in favour of development was already established, and this approach is being retained in the LPR. By continuing this approach, there is a justification for a significant windfall allowance in the supply for sites that will continue to come forward in the sustainable settlements of the District. The NPPF at paragraph 69(c) states that local planning authorities should:

“Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlement boundaries for homes”.

- 3.11. Though the contribution from large and medium sites is significant, it is considered that these should not be included within the windfall allowance. Development of large, and to a lesser extent, medium sized unallocated sites tends to vary significantly from year to year, compared to the relatively steady level of small site

windfall completions. Exclusion of these large and medium sites as well as the prior approvals from the allowance would introduce significant flexibility to the supply. It is considered, however, that there is a clear case for an allowance for small site windfalls. It is logical to assume that these sites will continue to come forward. Over the past 16 years of the plan period an average of 140 small site windfalls have been completed each year, as set out in Table 3.2 above.

- 3.12. It is therefore considered that a small site allowance of 140 dwellings per year is justified and appropriate, based on past levels of completions. No allowance is included for sites of 10 or more dwellings.
- 3.13. A total windfall allowance of 140 dwellings per annum is equivalent to only 37% of the average windfall completions over the current plan period to 2022 but is considered a prudent allowance. Excluding the units on small site windfall developments which already have planning permission (431 units) the small site windfall allowance for the period 2022 – 2039 is a total of 1,949 dwellings.

f. New sites allocated in the LPR

- 3.14. Additional sites are required to help meet the housing requirement over the plan period to 2039. The sites considered for allocation were identified through the HELAA. The HELAA forms part of the evidence base for the LPR, and it makes a preliminary assessment of the potential and suitability of sites. It does not make recommendations as to whether a site should be allocated, this is done through the site selection process.
- 3.15. The methodology used for the site selection process is set out within the Site Selection Methodology Paper¹⁴. The Sustainability Appraisals and site assessments forms are included within the SA/SEA.
- 3.16. The new sites allocated within the LPR are included within the housing trajectory (including phasing of sites) which is contained within Appendix 2.

g. New sites to be allocated in Neighbourhood Plans

- 3.17. There are nine designated Neighbourhood Areas in the district, with two having adopted Neighbourhood Plans.
- 3.18. Neighbourhood Plans are able to allocate sites to help meet the local housing need, however, it is not compulsory for plans to include allocations. Where a Neighbourhood Plan seeks to allocate sites the Council have given the Parish/Town Council a housing number to meet within the plan. This number takes into account the location and status of the settlements within the Neighbourhood Area, as well as the development opportunities identified in the HELAA. The allocations in Neighbourhood Plans will form part of the housing to supply to meet the housing requirement.
- 3.19. Table 3.3 below sets out the housing requirements for the designated Neighbourhood Areas in the district.

¹⁴ Site Selection Methodology Paper: <https://www.westberks.gov.uk/local-plan-evidence>

Table 3.3 Housing requirements for the Designated Neighbourhood Areas

Designated Neighbourhood Area	Housing number to allocate	Justifications
Burghfield	0	<p>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	0	<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> <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> <p>It is recognised that windfall development may come forward over the plan period.</p>
Cold Ash	0	<p>A requirement of 40 dwellings was identified for the Cold Ash designated Neighbourhood Area in the emerging draft (Regulation 18) LPR.</p> <p>The Parish of Cold Ash contains the village of Cold Ash, the hamlet of Ashmore Green, and small parts of the towns of Newbury and Thatcham. Cold Ash village 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. Ashmore Green is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill</p>

Designated Neighbourhood Area	Housing number to allocate	Justifications
		<p>development subject to the character and form of the settlement. Newbury and Thatcham are both identified as 'Urban Areas' because of the wide range of services they offer and subsequently both will be the focus for the majority of development.</p> <p>Cold Ash sits on the southern edge of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Much of the village is just outside of the boundary, however the houses to the north and east of The Ridge are within the boundary. The AONB is a nationally important and legally protected landscape and the NPPF is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>Within the Housing Site Allocations DPD there were three allocated sites in Cold Ash Parish for a total of between 90-100 dwellings. One site is being built out (St. Gabriel's Farm – 5 dwellings), one has not yet commenced (Land at Coley Farm – 75 dwellings), whilst the third is not being retained as an allocation due to concerns around deliverability (Land at Poplar Farm – 10-20 dwellings).</p> <p>The February 2020 HELAA identifies five sites as having potential. Taking the development potential of these sites into consideration alongside the placing of the towns/villages in Cold Ash parish within the settlement hierarchy, existing allocations, as well as the AONB, it is considered that a housing requirement of 40 dwellings would be appropriate.</p> <p>In respect of HELAA site CA15, the eastern site parcel falls within Cold Ash Parish and the western parcel within Shaw-Cum-Donnington Parish. The Council's Highways Team have identified that for this site as well as site SCD4, the provision of a through route from the B4000 to the A339 is required. This site along with SCD4 will only be supported by Highways if this is provided. Combined, sites CA15 and SCD4 are of a strategic scale. It is for the local planning authority to plan for strategic sites.</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> <p>In light of the site selection work, the housing number to allocate for Cold Ash has been amended to zero.</p>

Designated Neighbourhood Area	Housing number to allocate	Justifications
Hermitage	0	<p>It had been the original intention of the Parish Council to include allocations within the plan, and a housing number of 20 dwellings was identified within the emerging draft (Regulation 18) LPR, but with a caveat that a higher number might be possible subject to further Landscape Sensitivity and Capacity Assessment on the sites identified with potential in the HELAA.</p> <p>The figure was a reflection of Hermitage being a service Village within the Settlement Hierarchy (meaning that it has a limited range of services and so is suitable for a limited amount of development), being located within the North Wessex Downs AONB, and the development potential of the two sites identified within the HELAA as having potential.</p> <p>In 2022, the Parish Council advised that they no longer wished to include any allocations and the neighbourhood plan would instead include only development management policies. As a result, new allocations within Hermitage have been considered through the LPR and the site Land adjacent to Station Road has been proposed for allocation.</p>
Hungerford	55	<p>The Parish of Hungerford is located within the North Wessex Downs AONB and contains the town of Hungerford and the small settlement of Eddington. Hungerford is identified as a Rural Service Centre in the settlement hierarchy. Rural Service Centres have a range of services and reasonable public transport provision meaning there are opportunities to strengthen the role in meeting the requirements of surrounding communities.</p> <p>Eight sites were identified in the HELAA (February 2020) as having potential. Taking the development potential of these sites, alongside the location of Hungerford within the settlement hierarchy and the AONB it is considered that a housing requirement of 55 dwellings is appropriate.</p>
Lambourn	25	<p>The Parish of Lambourn is located within the North Wessex Downs AONB and contains the village of Lambourn and the hamlet of Eastbury. Lambourn is identified as a Rural Service Centre in the settlement hierarchy, with a range of services and reasonable public transport provision.</p> <p>Two sites were allocated in the Housing Site Allocations DPD for a total of 65 dwellings. Development has not commenced on the sites and they have been retained as allocations within the LPR.</p> <p>The February 2020 HELAA identified two sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Lambourn within the settlement hierarchy as well as the AONB, it is considered that a housing requirement of 25 dwellings is appropriate.</p>

Designated Neighbourhood Area	Housing number to allocate	Justifications
Newbury	0	Newbury Town Council have advised that they do not wish to include allocations within the neighbourhood plan.
Stratfield Mortimer	0	<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	0	<p>It had been the original intention of the Parish Council to include allocations within the plan, and a housing number of 175 dwellings was identified within the emerging draft (Regulation 18) LPR.</p> <p>The figure of 175 dwellings was a reflection of Tilehurst being an Urban Area within the settlement hierarchy (meaning that it will be the focus for new development due to the wide range of services offered), the western part of Tilehurst Parish being within the North Wessex Downs AONB, and the development of the four sites identified within the February 2020 HELAA as having potential.</p> <p>In 2022, the Parish Council advised that they no longer wished to include any allocations and the neighbourhood plan would instead include only development management policies. As a result, new allocations within Tilehurst have been considered through the LPR. One site was recommended for allocation (Pincents Lane, Tilehurst) by officers, however this was not supported by Members.</p>

h. Overall housing supply to 2039

- 3.20. Through the sources mentioned in sub-sections (a) to (h) above, there is a total supply of 9,137 dwellings and this is set out in Table 3.4 below.

Table 3.4 Housing supply at 31 March 2022

Supply category	Net units outstanding
Local Plan retained allocations	
• Core Strategy: Sandleford Park Strategic Site Allocation	1,580
• Housing Site Allocation DPD allocations	990
<i>Subtotal</i>	2,570
Neighbourhood plan allocation	
• Stratfield Mortimer	82
<i>Local Plan allocations not being retained (due to site being at an advanced stage of construction)</i>	
• Core Strategy: Newbury Racecourse	465
• Housing Site Allocation DPD allocations	256
<i>Subtotal</i>	721
Existing planning commitments on unallocated sites	1,958
Existing planning commitments for C2 Use Class communal accommodation	57
New allocations within the LPR	1,720
Sites to be allocated within neighbourhood plans	
• Hungerford	55
• Lambourn	25
<i>Subtotal</i>	80
Small site windfall allowance to 2039	1,949
Total	9,137

4. Housing trajectory

- 4.1. Paragraph 74 of the NPPF states that *“strategic policies should include a housing trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”*
- 4.2. Strategic policy SP12 of the proposed submission (Regulation 19) LPR sets out the approach to housing delivery, and Appendix 8 of the LPR includes the housing trajectory graph. For information, the housing trajectory graph is also included within Appendix 1 of this Background Paper.
- 4.3. In order to determine the rate of housing delivery over the plan period, the Council produced a site deliverability form that was sent to agents/developers of:
 - sites proposed for allocation in the LPR;
 - sites allocated within the current Local Plan but which are not being retained as allocations in the LPR due to development being in progress;
 - Sites with planning permission for communal accommodation (Use Class C2);
 - unallocated sites with planning permission for 10 or more units; and
 - sites identified through the prior approval process for 10 or more units.
- 4.4. Responses have been used to both assess deliverability of the site and to phase dwelling completions. The completed forms as well as any email responses received are included in Appendix 3.
- 4.5. The Council considers the information on delivery provided by the landowner / developer as the most robust source and uses this as the starting point for considering what might reasonably be delivered within the five year period. Where necessary, the Council has adjusted the projected delivery to take account of any overly optimistic view, ensuring that the figures relied on by the Council within the five year period are as realistic as possible.
- 4.6. In cases where the landowner/developer has not responded to approaches by the Council, the Council has assessed deliverability of the site using its knowledge of the developer, its knowledge of the specific site and proposed development, and gives consideration to likely lead in times and build out rates on different type of sites.
- 4.7. In respect of small unallocated sites with planning permission, these have not been assessed for deliverability in the same manner as large and medium sites, however the definition of 'deliverable' is clear that sites that are not major development should be considered deliverable until permission expires.

5. Exceptional Circumstances Test for major development in the AONB

- 5.1. The North Wessex Downs AONB covers 74% of West Berkshire, and is an area where the landscape is managed to conserve and enhance its natural beauty in accordance with its national designation. The NPPF at paragraph 177 states that permission should be refused for major development in the AONB other than in exceptional circumstances, where it can be demonstrated that the development is in the public interest. Consideration needs to include:
- The need for development, including in terms of any national considerations, and the impact of permitted/refusing the development on the local economy
 - The cost of, and scope for, developing outside the AONB or meeting the need in some other way
 - Any detrimental effect on the environment, landscape and recreational opportunities, and the extent to which that could be moderated.
- 5.2. While paragraph 177 relates to the consideration of applications for development, where a Local Plan seeks to allocate sites which would meet the definition of major development in the AONB it is considered appropriate to carry out the test to ensure the allocation would have a reasonable prospect of being delivered.
- 5.3. The NPPF definition of major development has been used for the Exceptional Circumstances test:
- For housing – development where 10 or more homes will be provided, or the site has an area of 0.5ha or more
 - Non-residential development – an additional floor space of 1,000m² or more, or a site of 1ha or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015¹⁵.
- 5.4. Five of the proposed new residential allocations, and five of the residential allocations that have been retained from the current Local Plan are located within the North Wessex Downs AONB and meet the threshold for major development.

Table 4.1. Major residential allocations within the North Wessex Downs AONB

Site	LPR policy reference	Approximate numbers
<i>New allocations</i>		
Land at Chieveley Glebe, Chieveley	RSA17	15
Land adjacent Station Road, Hermitage	RSA22	34
Land adjacent The Haven, Kintbury	RSA23	20
Land north of South End Road, Bradfield Southend	RSA16	20
Land west of Spring Meadows	RSA19	15
<i>Retained Local Plan allocations</i>		
Pirbright Site, Compton	RSA18	140
Land off Charlotte Close, Hermitage	RSA20	15
Land south east of the Old Farmhouse, Hermitage	RSA21	10
Land adjoining Lynch Lane, Lambourn	RSA14	60
Stonehams Farm, Tilehurst	RSA6	64-bed care home (3,450 sq.m)

¹⁵ Town and Country Planning (Development Management Procedure

a. The need for development

- 5.5. Chapter 2 above sets out the local housing need within the district, as well as the housing requirement.
- 5.6. Policy SP2 (North Wessex Downs AONB) of the LPR is clear that development within the AONB is required to support its local communities and rural economy in a way that is commensurate with the statutory status of the AONB as a nationally valued landscape.
- 5.7. The allocations within the AONB have been directed to the settlements within the settlement hierarchy. The purpose of the settlement hierarchy is to ensure that new development planned throughout the plan period is directed to the more sustainable settlements. Within the AONB, six villages are Service Villages' (Bradfield Southend, Chieveley, Compton, Great Shefford, Hermitage, and Kintbury), whilst three are Rural Service Centres (Hungerford, Lambourn, and Pangbourne). Service Villages are smaller settlements with a more limited range of services so are suitable for a limited amount of growth. Rural Service Centres have a good range of key services and opportunities for employment, community, and education.

b. The cost of, and scope for, developing outside of the AONB or meeting the need in some other way

- 5.8. The adopted Core Strategy DPD (which forms part of the current Local Plan) divides the district into geographical areas in order to deliver the spatial strategy. Such an approach was reaffirmed following the Regulation 18 consultation on the LPR that took place between 9 November and 21 December 2018. The LPR includes the following three spatial areas – Newbury and Thatcham, Eastern Area, and the North Wessex Downs AONB.
- 5.9. There are significant constraints to development within both the Newbury and Thatcham and Eastern Area Spatial Areas:
- (i) *Constraints within the Newbury and Thatcham Spatial Area*
- 5.10. A number of rivers and water course flow through Newbury, with the River Kennet, Kennet and Avon Canal running through the centre of the town, the River Enborne to the south and the River Lambourn entering from the North West and reaching its confluence with the River Kennet to the east of the town. The areas immediately adjacent to these water courses are within Flood Zones 2 or 3. There are a number of important environmental and heritage assets within Newbury including SSSIs (River Lambourn and River Kennet), Local Wildlife Sites and the River Lambourn Nutrient Neutrality Zone washes over the west of the town. The site of the first battle of Newbury is located to the west and to the south is the Registered Park and Garden of Sandleford Priory.
- (ii) *Constraints within the Eastern Area Spatial Area*
- 5.11. The eastern edge of the AONB abuts the western edge of the built up area of Tilehurst and Calcot, and there are extensive areas of floodplain to the south of Holybrook. The Atomic Weapons Establishment (AWE) has two major sites in this area, at Aldermaston and Burghfield. Changes to legislation have resulted in the redetermination of the emergency planning arrangements. The Detailed Emergency

Planning Zone (DEPZ) now covers a significant part of this spatial area, and development is heavily restricted by this designation.

(iii) *Spatial distribution of LPR allocations*

- 5.12. Despite the constraints that exist within the Newbury and Thatcham and Eastern Area Spatial Areas, 92% of the residential allocations within the LPR still within these areas as Table 4.2 illustrates below:

Table 4.2: Spatial distribution of LPR allocations

Site	LPR policy reference	Approximate numbers
<i>Newbury / Thatcham Spatial Area</i>		
Sandleford Park, Newbury	SP16	1,500
North East Thatcham	SP17	1,500
Land north of Newbury College, Monks Lane, Newbury	RSA1	15
Land at Bath Road, Speen, Newbury	RSA2	100
Land at Coley Farm, Stoney Lane, Newbury	RSA3	75
Land off Greenham Road, Newbury	RSA4	160
Land at Lower Way, Thatcham	RSA5	85
<i>Total</i>		<i>3,435</i>
<i>Eastern Area Spatial Area</i>		
72 Purley Rise, Purley on Thames	RSA7	35
Land adjacent to Bath Road and Dorking Way, Calcot	RSA8	35
Land between A340 and The Green, Theale	RSA9	100
Whitehart Meadow, Theale	RSA10	40
Former sewage treatment works, Theale	RSA11	60
Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common	RSA12	100
Land north of A4 at junction of New Hill Road, Woolhampton	RSA13	16
<i>Total</i>		<i>386</i>
<i>AONB Spatial Area</i>		
Land adjoining Lynch Lane, Lambourn	RSA14	60
Land at Newbury Road, Lambourn	RSA15	5
Land north of South End Road, Bradfield Southend	RSA16	20
Land at Chieveley Glebe, Chieveley	RSA17	15
Pirbright Institute Site, High Street, Compton	RSA18	140
Land west of Spring Meadows, Great Shefford	RSA19	15
Land off Charlotte Close, Hermitage	RSA20	15
Land to the south east of the Old Farmhouse, Hermitage	RSA21	10
Land adjacent Station Road, Hermitage	RSA22	34
Land adjacent to The Haven, Kintbury	RSA23	20
<i>Total</i>		<i>334</i>

c. Effect on the environment, landscape and recreational opportunities

- 5.13. The Council has placed sufficient weight on conserving the landscape and scenic beauty of the North Wessex Downs AONB. The Council has had regard to its duty under Section 85 of the Countryside and Rights of Way Act 2000 and has placed great weight on conserving the landscape and scenic beauty of the area in accordance with paragraph 176 of the NPPF.
- 5.14. When assessing the landscape impact (including visual impact) of housing development on greenfield sites on the edge of settlements there are three main aspects which need to be considered.
- 5.15. Firstly, there is the presumption that all of the AONB is designated for its natural beauty and therefore all of its landscape and its settlements are subject to the same consideration and weight to conserve and enhance that natural beauty. However in addition each part of the AONB has special landscape qualities, some of which are very typical of the AONB, others of which are locally important but equally special. In assessing the landscape and visual impact both the overall presumption and the locally found special qualities need to be considered. A good understanding of the latter, informed by adopted landscape character assessments, needs to be used to judge the impact.
- 5.16. Secondly, in assessing the landscape and visual impact, consideration must be given to the settlement pattern, its historical evolution, the pattern of built form, the landscape that shaped it, its green infrastructure and its individual social and economic dynamics (such as the racing industry at Lambourn). Housing on settlement edge sites needs to reflect these patterns in order to retain the local distinctiveness of the town or village and hence of the AONB.
- 5.17. Thirdly, in an assessment of the impact on the special qualities of the local landscape and its views, consideration must be given to the value of the character of the site, its vegetation, landform, its historic landscape value, openness, relationship with special features such as rivers, historic features and its importance as part of the wider landscape. Again it is essential that any development does not harm the local distinctiveness of the area.
- 5.18. The impact on these aspects are all matters of judgement. They all must be weighed in the balance. A visual impact is not synonymous with a landscape impact. A proposed development may still cause unacceptable harm to the landscape and special qualities even if the visual impact is minimal or can be successfully screened by planting. Similarly an exposed site may still have the potential for development if there is little harm to the special qualities of the landscape. If the existing built form is harming the landscape and a sense of place and local distinctiveness have been eroded or lost, the site could present an opportunity to strengthen or restore that character by enhancing the settlement characteristics. A balanced approach needs to be taken.
- 5.19. Landscape Sensitivity/Capacity Assessments (LSA/LCA) take this balanced approach. Each site with potential for development was considered on its own merits and was tested to see if development would result in harm to

the natural beauty and special qualities of the AONB. The LSA/LCA identified sites that could potentially be developed without harming the landscape subject to further detailed landscape and visual impact assessments and provided design, siting and green infrastructure requirements specified for each site are met. The LSA/LCA ruled out sites where the harm is demonstrable.

- 5.20. The LSA/LCA clearly sets out the landscape and visual constraints on development including where to avoid cumulative impacts, how to establish a strong boundary between a settlement and the open countryside and how to enhance the site in landscape and visual terms.
- 5.21. The LSA/LCA considers both the landscape and visual characteristics of each site in the context of the special qualities. In considering the potential visual impact of development, the LSA/LCA takes into account both near and distant views but considers not only whether the site would be visible but also the context of the site in these views and how development might change those views. Therefore if a site was visible but development would appear to sit within the settlement, that site was considered to be less sensitive and could better accommodate development, subject to site specific design requirements.
- 5.22. The LSA/LCA acknowledges the cumulative effect of developing on a number of sites and makes recommendations for sequential development of small sites. These recommendations are made to ensure that the special qualities of the settlements are conserved.
- 5.23. The LSA/LCA sets out design recommendations that are designed to assist in accommodating development which would not fundamentally harm the natural beauty of the AONB. These recommendations are mainly required to enhance the AONB where the existing settlement edge is poorly designed or has an adverse impact on the wider landscape; where the development needs to respect a local landscape or townscape feature; and where these design features are needed to ensure that the development is in keeping with the local character. Screening to make development acceptable is not considered an appropriate way to mitigate potential harm to an AONB. Therefore the LSA/LCA identifies sites for potential development where they can best be located in the landform, or best relate to the existing built form, or are enclosed by substantive established native deciduous tree cover, of value in its own right.
- 5.24. The HELAA and the site assessments (included within Appendix 8b of the SA/SEA), include consideration of the LSA/LCAs.

6. Affordable Housing

- 6.1. In acknowledging that there is a need to provide for a reasonable mix and balance in size and type of housing in the District, the Council also recognises the community's need for affordable housing. This is addressed in the LPR.
- 6.2. The NPPF requires local authorities to assess the need for affordable housing, and then to specify in planning policies the amount and type of affordable housing which needs to be provided.
- 6.3. The NPPF specifies the following types of housing as affordable:
- **Affordable housing for rent:** social or affordable rent, set at least 20% below local market rents, including Build to Rent.
 - **Starter Homes:** new homes available for qualifying first time buyers (aged 23-40) to be sold at a discount of at least 20% of the market value.
 - **Discounted market sales housing:** sold at a discount of at least 20% below local market value, with eligibility determined with regard to local incomes and house prices.
 - **Other affordable routes to home ownership:** housing provided for sale that provides a route to ownership for those who couldn't achieve this through the market. Includes shared ownership, relevant equity loans, other low cost homes for sale (at least 20% discount) and rent to buy.

a. First Homes

- 6.4. In addition to the affordable housing types set out above, the Government has recently introduced 'First Homes' which are in effect replacing Starter Homes. First Homes are discounted market sale homes which:
- (a) must be discounted by a minimum of 30% against the market value;
 - (b) are sold to a person or persons meeting the First Homes eligibility criteria;
 - (c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,
 - (d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).
- 6.5. First Homes can only be bought by first time buyers and their household income should not exceed £80,000. Purchasers should also have a mortgage to fund a minimum of 50% of the discounted purchase price. The PPG also sets out some additional criteria that local authorities or neighbourhood planning groups can apply in addition to the national criteria. This may involve lower income caps (if this can be justified with reference to local average first-time buyer incomes), a local connection test, or criteria based on employment status. Authorities can also prioritise key workers for First Homes, with the definition of key worker being determined locally. This could be any person who works in any profession that is considered essential for the functioning of a local area.
- 6.6. The PPG also sets out a number of suggested methods by which local authorities could introduce their local requirements for First Homes such as local connection criteria or discount levels or income caps. These methods include interim policy statements and updating Local Plan policies. West Berkshire Executive on the 9 June

2022 approved a First Homes Policy Position. The Council will assess applications from potential buyers to check they meet the eligibility criteria in the Policy. As well as the national criteria the approved policy position also sets a local connection criteria to ensure that local people in need of affordable housing would be given priority access to First Homes. This includes on First Homes exception sites under proposed Policy DM16.

b. The Supply of Affordable Housing

- 6.7. The Council is committed in its Local Housing Strategy to providing more affordable housing within the District to meet local needs.
- 6.8. The NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or a financial contribution in lieu can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.9. The NPPF states that local authorities should not require affordable housing to be provided on sites that are not major developments (10+ homes) other than in designated rural areas where policies may set a lower threshold of 5 units or fewer.
- 6.10. On major development sites (10+ homes), paragraph 65 of the NPPF requires planning policies and decisions to expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in an area or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. This requirement is now addressed through securing a proportion of First Homes from housing schemes.
- 6.11. The PPG now states that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations
- 6.12. In line with the NPPF, the PPG also sets out the restrictions on local authorities in requiring affordable housing to be provided on small sites. It advises that affordable housing should only be sought on major residential developments (defined as 10 or more homes or a site area of 0.5 hectares or more). The PPG advises however that in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985¹⁶, which includes National Parks and Areas of Outstanding Natural Beauty.
- 6.13. The PPG states that all households whose needs are not met by the market and which are eligible for one or more of the types of affordable housing set out in the NPPF are considered to be in affordable need.
- 6.14. In terms of needs, the PPG advises that data should be collected on the number of homeless households, the number in priority need who are in temporary accommodation, the number in over-crowded housing, the number of concealed households, the number of existing affordable tenants housed in unsuitable homes,

¹⁶ Housing Act 1985: <https://www.legislation.gov.uk/ukpga/1985/68/contents>

and the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.

- 6.15. In terms of considering the supply of affordable housing, the PPG states that suitable surplus stock (vacant properties), re-lets and the committed supply of new affordable homes should all be taken into account.
- 6.16. The PPG advises that the affordable need is then to be calculated by subtracting the available stock from the overall need figure, and then converting the overall need figure into an annual figure based on the plan period.

(i) The Local Context

- 6.17. Policy CS6 (Provision of Affordable Housing) of the adopted Core Strategy DPD requires:

- On development sites of 15 dwellings or more (or 0.5 hectares or more)
 - 30% provision on previously developed land, and
 - 40% on greenfield land.
- On development sites of less than 15 dwellings sliding scale approach as follows:
 - 30% provision on sites of 10 – 14 dwellings; and
 - 20% provision on sites of 5 – 9 dwellings

- 6.18. Since the adoption of the Core Strategy DPD, national policy and guidance in relation to site size thresholds has changed. Following a written ministerial statement in 2014 and subsequent court cases local policy on affordable housing is now interpreted having regard to updated national policy and guidance. The result is that for West Berkshire, the affordable housing requirements of Policy CS6 of the adopted Core Strategy DPD as explained below remain valid and accord with national guidance.

- 6.19. National policy and guidance in the NPPF and the PPG states that affordable housing should only be sought from major development of 10 or more dwellings or on housing sites of 0.5ha or more across the district. In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985¹⁷, which includes National Parks and Areas of Outstanding Natural Beauty. As about 74% of West Berkshire is within an AONB and most of the remaining parishes are designated rural areas it is therefore considered justified and reasonable for the Council to secure 20% affordable housing on sites of 5 – 9 dwellings.

(ii) Proposed submission (Regulation 19) LPR Policy SP19 Affordable Housing

- 6.20. The proposed affordable housing policy in the LPR is different from that in the Core Strategy. In accordance with national policy the Council will expect developers to provide 30% affordable housing on previously developed land and 40% on greenfield land on all major proposals defined as 10 or more dwellings. The Council will also seek 20% provision on sites between five and nine dwellings.

¹⁷ Section 157(1) of the Housing Act 1985: <https://www.legislation.gov.uk/ukpga/1985/68/section/157>

- 6.21. Policy SP19 (Affordable Housing) seeks to balance the provision of identified housing needs, with the need to ensure deliverability. This is to avoid overburdening developments by a scale of obligations which would threaten economic viability.

(iii) Local Housing Need Assessment

- 6.22. The PPG provides guidance on how to establish the current and future affordable need using suggested data sources. Paragraph 20 of the PPG (Reference ID: 2a-020-20190220) references data sources such as the Council's own Housing register, the English Housing Survey and the 2011 Census. The same paragraph also highlights that care should be taken by authorities to avoid double counting from data sources.
- 6.23. The 2016 SHMA provides an in depth assessment of housing affordability in West Berkshire, by looking at local housing costs and incomes. It also provides an assessment of the annual need for affordable homes. This was reviewed and updated by the Updated Housing Needs Evidence (May 2020 and updated in July 2022)¹⁸. The evidence shows that housing affordability remains a key issue in West Berkshire, with the Government's 2021 statistics showing the median house price in the district (£380,000) being 9.73 times the average annual earnings.
- 6.24. Section 4 of the Updated Housing Needs Evidence provides an assessment of the need for affordable housing in West Berkshire and the three sub-areas. The analysis specifically considers general needs housing, with further analysis of specialist housing (e.g. for older people). Detailed analysis can be found in the reports.
- 6.25. The analysis in the most up to date evidence (Updated Housing Needs Evidence) follows the PPG (Sections 2a-018 to 2a-024) and provides two main outputs, linked to Annex 2 of the NPPF. Firstly an assessment of the need for affordable social rented housing and secondly for affordable home ownership. The analysis also considers First Homes, which looks likely to become the main tenure for affordable home ownership. Affordability is assessed by considering what income levels are likely to be needed to access private rented housing, and owner occupation housing.
- 6.26. The Updated Housing Needs Evidence calculated affordable housing need by adding together the current unmet housing need and projected future housing need and then subtracting from this the supply of affordable housing arising from turnover of existing stock, in accordance with the PPG. Table 4.15 of the Updated Housing Needs Evidence shows the results of this calculation, with total affordable housing need of 330 per annum in the District. The impact of requiring the provision of affordable housing on the viability of schemes and therefore delivery was tested at various stages of the preparation of the Local Plan. The proposed thresholds for affordable housing in Policy SP19 are supported by the findings and recommendations of the Affordable Housing Viability Study (July 2020)¹⁹.
- 6.27. In accordance with NPPF, 2021 paragraph 62, the Updated Housing Needs Evidence also provides evidence of the range of tenures needed. The analysis supports the Council's draft affordable Policy SP19 which seeks a tenure split of the affordable housing on each development site of 70% social rented. The evidence provides a clear justification for the Council to secure social rents as the priority

¹⁸ Updated Housing Needs Evidence (July 2022): <https://www.westberks.gov.uk/local-plan-evidence#housing>

¹⁹ Affordable Housing Viability Assessment (July 2020): <https://www.westberks.gov.uk/local-plan-evidence#housing>

affordable housing tenure in case-by-case negotiations. This would ensure that affordable homes are provided for those on the lowest incomes.

- 6.28. In relation to the need for affordable home ownership housing, although the evidence identifies a need the analysis considers this to be more limited compared to the need for affordable social rented.
- 6.29. Both the total percentage requirement and the tenure split identified through the Updated Housing Needs Evidence were tested through various iterations of the LPR Whole Plan Viability Assessment to determine their impact upon viability and therefore deliverability. Whilst an earlier version of the viability assessment identified some issues with viability, the final LPR Whole Plan Viability Assessment (2022)²⁰ found all the hypothetical typologies to be viable when tested against the cumulative impact of all policies on viability including the different threshold affordable housing requirement and tenure mix set out in LPR Policy SP19.

(iv) Build to Rent

- 6.30. Policy SP19 contains criteria requiring schemes that consist of 100% build to rent (BtR) units to provide affordable private rent (APR), discounted by a minimum of 20% from local market rents.
- 6.31. Key guidance on APR, set out in PPG considers a general benchmark provision of 20% APR homes (maintained in perpetuity) as being suitable for a BtR scheme. If a different proportion is required, it should be justified using evidence emerging from the Council's local housing need assessment and set out in the Local Plan.
- 6.32. Whilst the national benchmark level for APR in the PPG is set at a minimum 20%, the Council should aim to deliver a much higher percentage of affordable housing from BtR schemes, consistent with percentages sought for more traditional forms of affordable housing. The evidence shows that housing affordability remains a key issue in West Berkshire. Affordable housing from BtR should be sought in accordance with general requirement as set out in criterion 2 of Policy SP19.
- 6.33. For example on a brownfield site it would be 30% APR. This is in line with the requirements of adopted Core Strategy Policy CS6 and the Planning Obligations SPD, 2014²¹.

²⁰ Whole Plan Viability Assessment: <https://www.westberks.gov.uk/local-plan-evidence>

²¹ Planning Obligations Supplementary Planning Document (December 2014): <https://www.westberks.gov.uk/obligationsspd>

7. Housing Type and Mix

- 7.1. The NPPF requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and to reflect this need in their planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 7.2. The PPG includes a section on 'the housing needs of different groups' which provides guidance on how the housing needs of various groups can be assessed.
- 7.3. The housing needs of the various community groups and the emerging population trends and demographics have been assessed through the SHMA and the subsequent Updated Housing Needs Evidence for the District. The most up to date evidence - the 2022 Updated Housing Needs Evidence has established the mix of new homes required which has been taken into account in the revision of Policy SP18. To meet the projected local housing needs for the District, the assessment goes on to set out the dwelling size, household type and tenures that are required to be built over the plan period.
- 7.4. The analysis linked to long-term (18-year) demographic change concludes that the following represents an appropriate mix of affordable and market homes, this takes account of both household changes and the ageing of the population – the analysis also models for there to be a modest decrease in levels of under-occupancy (which in West Berkshire are very high in the market sector).

Table 5.1. Suggested Mix of Housing by Size and Tenure

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Affordable home ownership	20-25%	45-50%	20-25%	5-10%
Affordable housing (rented)	30-35%	35-40%	20-25%	5-10%

Source: Derived from a range of sources

- 7.5. For open market homes it recommends the main focus should be on 2 and 3 bedroomed homes. For affordable rented housing it recommends the focus should be 1 and 2 bedroomed homes.
- 7.6. Ensuring new residential development provides a good mix of smaller homes will help to meet the needs of newly forming households, families and older households wishing to downsize. There is a desire to move away from providing 'large executive style housing' that does not necessarily meet local needs.
- 7.7. The prescribed mix of house types required in 'major development' schemes will therefore be informed by the Updated Housing Needs Evidence as well as neighbourhood plans and local needs surveys.

8. Specialist Housing

- 8.1. A key challenge for the Local Plan is how to meet the needs of an ageing population. From the findings of the latest evidence in the Updated Housing Needs Evidence and the Office for National Statistics population forecasts the older population is predicted to grow significantly. Within West Berkshire over the plan period where there is a projected 64% increase in residents aged 75 or over.
- 8.2. Specialist accommodation can include many different types of accommodation that caters for people's specific needs. Specialist housing is housing for older, or disabled people and can include supported housing or where access to support is provided if required. The Council recognizes the importance of providing a variety of housing types to cater for a wide range of accommodation needs.
- 8.3. The number of people with a long term health problem or disability is expected to increase. The analysis undertaken in the Updated Housing Needs Evidence shows a large increases in the number of older people with dementia (increasing by 67% from 2021 to 2039 and mobility problems (up 57% over the same period).
- 8.4. The accommodation discussed in this section of the topic paper would, in many cases, be suitable for anyone with a long term health problem or disability regardless of their age.
- 8.5. From the evidence base and consultation feedback the key priority areas for specialist accommodation needs are:
 - Enabling people to live independently in their homes, particularly as their needs change by providing for a range of homes, care and support options.
 - To provide specialist accommodation provision to give people a choice when they are unable to live independently.
- 8.6. The Proposed Submission (Regulation 19) LPR approach towards providing a housing mix of types, tenures and sizes takes this into account, in particular smaller properties to enable downsizing and more manageable accommodation. The objective of policies is to provide homes which are accessible and adaptable so people can stay living in their own homes for as long as they wish.
- 8.7. Services for adults with care and support needs including those in later life are predominantly the responsibility of the Social Services. West Berkshire Council's approach is to provide flexible and needs led support for an individual regardless of where they live; they are committed to supporting people to live independently in the setting of their choice and to provide support services to help this such as virtual wards and re-enablement strategies.
- 8.8. The number of people with limiting long-term health problems or disability is expected to increase, the majority of whom will be over 65 years or older. It is therefore important to have an accessible and adaptable housing stock. Housing for adults with care needs and older people can fall within the planning use class of C2 or C3 (dwelling house). Use class C2 residential institutions all have an element of care, and residential care homes or nursing homes fall within this category.
- 8.9. PPG states that: "Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach

demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations."

- 8.10. It can be seen by 2039 there is an estimated need for 1,137 additional dwellings with support or care across the whole study area. In addition, there is a need for 1,032 additional nursing and residential care bedspaces. In total, the older person's analysis therefore points towards a need for around 1,710 units over the 2021-39 period (95 per annum) – the older person need equates to some 19% of all homes needing to be some form of specialist accommodation for older people.
- 8.11. The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run.
- 8.12. The projected change shown in the number of people with disabilities provides clear evidence justifying delivering 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability.
- 8.13. The Government has introduced optional technical standards for the design of new homes. If a Local Authority wants new development to exceed the minimum requirements set by Building Regulations it must show evidence to justify the requirements for the higher standards in Local Plan policies. The need for specialist accommodation to be accessible, adaptable or built to wheelchair standards was analysed in the SHMA and most recently in the Updated Housing Needs Evidence and suggests the Council should seek:
 - All dwellings (in all tenures) to meet the M4(2) standards; and
 - up to 10% of all new market homes to be M4(3) compliant and potentially around a quarter in the affordable sector
- 8.14. In a September 2020 Government consultation proposals were set out to increase the required access standards for all housing through building regulations. This consultation set out a range of options for how standards can be improved. As a result of the consultation the Government has proposed to make all M4(2) standards mandatory for all housing development. This is to be implemented as a minimum standard through changed to the building regulations in due course. The M4(3) (Category 3: Wheelchair user dwellings) would continue as now where there is a local planning policy in place in which a need has been identified and evidenced.
- 8.15. Based on the evidence, consultation responses, the government's proposal to make all M4(2) standards mandatory and the significant projected increase in the number of elderly residents Policy SP18 has been revised to require all housing development to meet M4(2) standards.
- 8.16. We have also considered the impact of using M4(3) standards as part of our whole Local Plan Viability Report. As a result the Policy has been revised to require around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) unless evidence clearly demonstrates that this would make the scheme unviable.
- 8.17. Within the reasoned justification to Policy SP19 the Council expects the housing stock to be flexible; accessible and adaptable and age friendly to support the

changing needs of individuals and families at different stages of life, and those with a long-term health problem or disability.

- 8.18. The Proposed Submission (Regulation 19) LPR requires new development to deliver a wide choice of homes as set out in the Updated Housing Needs Evidence. This requirement will include an element of specialist housing which to a certain degree overlaps with the requirement for accessible, adaptable or wheelchair user homes.
- 8.19. In order to meet the identified need Policy DM19 requires specialist care housing to be delivered as part of the mix on the strategic housing allocations in the Local Plan and from other large housing site where feasible

9. Custom and Self Build

- 9.1. National policy requires local authorities to assess the demand for self-build and custom build housing in their area and to reflect it in local planning policies. Local Authorities are also required to maintain a register of people seeking serviced self-build plots in their area and have regard to this in carrying out their various functions. They must also grant enough planning permissions for self-build plots to meet the identified demand on the self-build register
- 9.2. The NPPF defines self-build and custom build housing as housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual.
- 9.3. The Self-build and Custom Housebuilding Act 2015²² places a duty on relevant public authorities to hold a register of individuals and groups interested in acquiring serviced land (with road access, connections to electricity, water and waste water) in their local authority area for the purpose of self or custom build housing to occupy as a home. Under the Act local authorities must have regard to it when undertaking their planning housing functions.
- 9.4. West Berkshire Council has set up a register that provides a source of information on how much local demand there is for people wishing to build their own homes in the District. There is a legal duty upon the Council to grant sufficient planning permissions for self-build plots to meet the demand for self-build and custom housebuilding within the authority's area. There are currently over 500 individuals on the register who are seeking plots of land in West Berkshire as Table 9.1 below shows:

Table 9.1: Number of self and custom-build dwellings granted permission and CIL exemptions granted

	BASE PERIOD 1	BASE PERIOD 2	BASE PERIOD 3	BASE PERIOD 4	BASE PERIOD 5	BASE PERIOD 6	BASE PERIOD 7
	9 May 2016 – 31 Oct 2016	30 Oct 2016 – 31 Oct 2017	31 Oct 2017 – 30 Oct 2018	31 Oct 2018 – 30 Oct 2019	31 Oct 2019 – 30 Oct 2020	31 Oct 2020 – 30 Oct 2021	31 Oct 2021 – 30 Oct 2022
New Demand	54	103	55	80	64	115	16 (as at 24 Jan 2022)
Cumulative demand	0	157	212	292	356	471	487 (as at 24 Jan 2022)
Permitted self and custom builds: single dwellings	26	29	18	33	19	Data not yet available	Data not yet available

²² Self-build and Custom Housebuilding Act 2015:
<https://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

	BASE PERIOD 1	BASE PERIOD 2	BASE PERIOD 3	BASE PERIOD 4	BASE PERIOD 5	BASE PERIOD 6	BASE PERIOD 7
	9 May 2016 – 31 Oct 2016	30 Oct 2016 – 31 Oct 2017	31 Oct 2017 – 30 Oct 2018	31 Oct 2018 – 30 Oct 2019	31 Oct 2019 – 30 Oct 2020	31 Oct 2020 – 30 Oct 2021	31 Oct 2021 – 30 Oct 2022
Permitted self-builds: multiple dwellings	0	0	0	3	0	Data not yet available	Data not yet available
Completions (CIL Part 2 exemptions granted)	0	5	8	2	Data not yet available	Data not yet available	Data not yet available

- 9.5. The proposed submission (Regulation 19) LPR policy in relation to self-build is set out in Policy DM18. The policy supports and encourages self-build homes in principle. The North East Thatcham strategic site allocation makes provision for at least 3% of dwellings to be delivered via serviced custom/self-build plots. Policy HSA 11 of the adopted Housing Site Allocations DPD is proposed to be retained within the LPR (Policy RSA7). It requires the provision of approximately 35 dwellings including an element of self-build homes.
- 9.6. Where appropriate, the council will work with developers, registered providers, landowners and relevant individuals or groups to address identified local requirements for self and custom-build homes as identified in the West Berkshire self and custom-build register.
- 9.7. The approach to self-build and custom housebuilding is set out in the policy wording and reasoned justification of policy DM18 of the Proposed Submission (Regulation 19) LPR. In order to meet potential demand for self-build and custom housebuilding the Council will support proposed developments where there is no adverse effect on local character. The 3% requirement of homes on the North East Thatcham strategic site to be for sale as self-build and custom housebuilding plots does not exclude custom and self-build on other housing sites or on windfall sites. The whole Plan Viability Assessment has considered the impact on viability in respect of custom and self-build housing.

10. Gypsies and Travellers

- 10.1. Planning policy for traveller sites (PPTS, 2015)²³ requires local authorities to set pitch and plot targets for travellers which address the likely permanent and transit site accommodation needs of travellers. It also states that the number of pitches or plots should relate to the size and location of the site and the surrounding populations size and density; local amenity and environment should be protected; and in rural settings the scale should not dominate the nearest settled community. It is considered that this can be addressed in the LPR through the development of small private sites in the District.
- 10.2. A key change introduced in PPTS is that the definition of Gypsy and Travellers now excludes travellers who have ceased to travel permanently. The effect of the amendment to the planning definition of a traveller means that only the accommodation needs of travellers who meet the PPTS definition of traveller need to be assessed.
- 10.3. The West Berkshire Traveller and Travelling Showpersons Accommodation Assessment Update (GTAA, 2021)²⁴ sets out the quantity of traveller pitches and plots required over the LPR period. This figure is based on a household survey and site/yard observation. A total of 16 households were interviewed in 2021.
- 10.4. In order to reconcile the requirements of national policies, the GTAA establishes an overall 'cultural' need for pitches which accords with the overall need for the Travelling community. It then identifies a figure for the level of need associated with those households meeting the definitions set out in the PPTS Annex 1.
- 10.5. Cultural need, which is defined as those Gypsy and Travellers and Travelling Showpeople who do not travel and identify themselves as part of the traveller and travelling showpeople community.
- 10.6. The GTAA recommends that the LPR should recognise an overall cultural need for 30 pitches of which 20 are from households that meet the PPTS definition over the period to 2037/38. There is potential to convert at least 8 transit pitches to permanent residential pitches at New Stocks Farm, Paices Hill, Aldermaston. This would reduce the overall need to 22 of which 12 are PPTS need. It is recommended that the LPR sets out criteria-based policies to inform future planning applications for small private sites to help address the needs identified.
- 10.7. Although there is no additional need for Travelling Showpersons plots, the GTAA recommends that the existing yard at Long Copse Farm, Enborne is safeguarded for Travelling Showpersons use.
- 10.8. 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.

²³ Planning policy for traveller sites (2015): <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

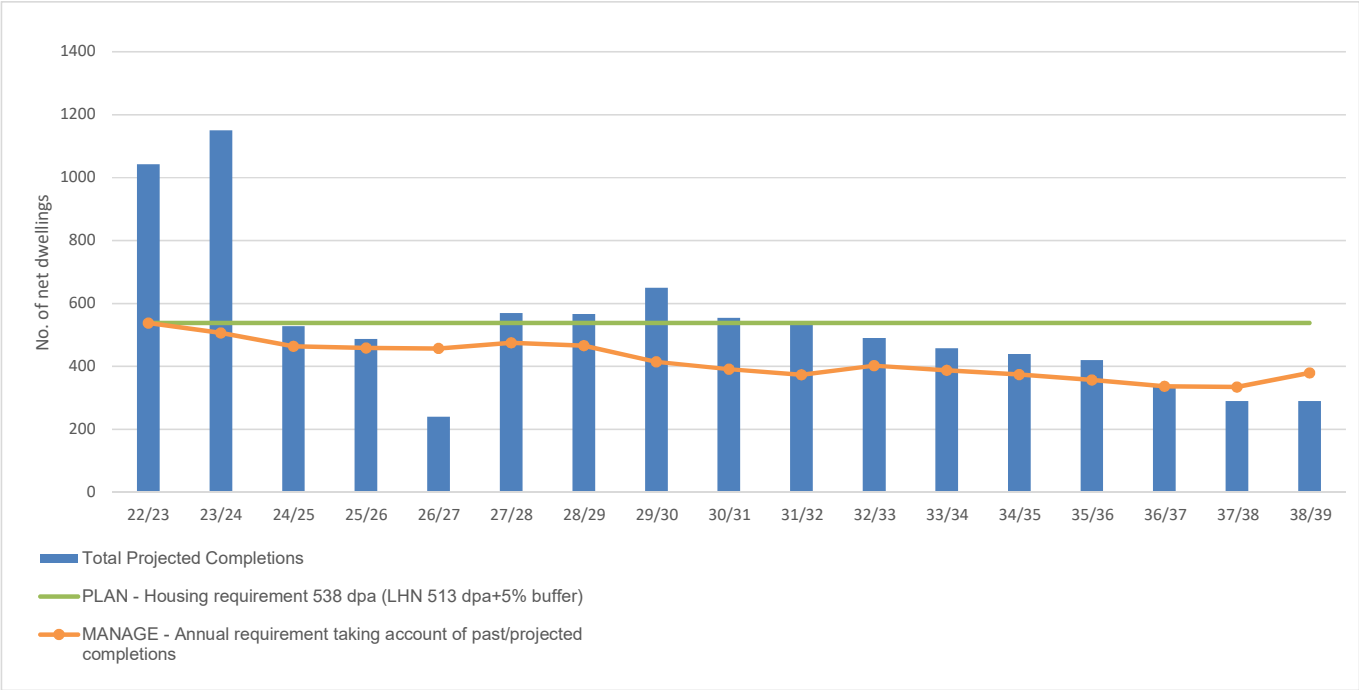
²⁴ Gypsy, Traveller and Travelling Showpeople Assessment (2019 and updated 2021): <https://www.westberks.gov.uk/local-plan-evidence#housing>

- 10.9. In the meantime Policy DM20 of the LPR sets out criteria-based enabling policy to be applied for the provision of additional sites and to inform future planning applications for small private sites to help address the needs identified. To meet the need the Council is also supporting the provision of small-scale traveller accommodation on the strategic development sites alongside new bricks and mortar housing, creating mixed communities and providing the same well-located accommodation with access to facilities, education and health care for travellers as for the settled community.

Appendices

Appendix 1: Housing trajectory graph

Housing Trajectory 2022/23 - 2038/39



Appendix 2: Housing trajectory (including phasing of sites)

Appendix 10 Housing Trajectory 2022/23 - 2038/39

	Planning status at 31 March 2022	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	TOTAL
Local Plan allocations not being retained (due to site being at an advanced stage of construction)																			
Core Strategy allocated site - Newbury Racecourse	Under construction	67	152	150	96	0	0	0	0	0	0	0	0	0	0	0	0	0	465
HSADPD 4B - Land west of New Road, North of Pyle Hill, Greenham	Under construction	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
HSADPD 7 - St Gabriel's Farm, The Ridge, Cold Ash	Under construction	2	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5
HSADPD 10 - Stonehams Farm, Tilehurst	Under construction	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50
HSADPD 12 - Land adjacent to Junction 12 of M4, Bath Road Calcot	Under construction	84	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	97
HSADPD 17 - Land to the north of A4, Woolhampton	Under construction	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
HSADPD 18 - Salisbury Road, Hungerford	Under construction	66	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	66
HSADPD 22 - Land off Stretton Close, Bradfield Southend	Under construction	4	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
Subtotal: Local Plan allocations not being retained		300	175	150	96	0	0	0	0	0	0	0	0	0	0	0	0	0	721
Existing planning commitments on unallocated sites																			
Beansheaf Farm, Bourne Close, Holybrook	Under construction	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
Sterling Industrial Estate, Newbury	Under construction	83	84	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	167
Land to rear of 1-15 The Broadway (Bayer site), Newbury	Full permission	0	36	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	72
Market Street redevelopment, Newbury	Under construction	141	59	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	200
1 West Street, Newbury	Full permission	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20
Westminster House, Bath Road, Padworth	Full permission	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
Land adjacent to Hilltop, Donnington: West	Under construction	46	55	55	52	0	0	0	0	0	0	0	0	0	0	0	0	0	208
Land adjacent to Hilltop, Donnington: East	Under construction	50	50	50	16	0	0	0	0	0	0	0	0	0	0	0	0	0	166
Crookham House, Crookham Common, Thatcham	Under construction	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Lakeside, Theale	Full permission for 7 dwellings	0	7	0	0	0	50	50	50	50	50	50	18	0	0	0	0	0	325
19 and 19A High Street, Theale	Full permission	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
Permitted non-allocated sites of 10+ dwellings at 31 March 2022		367	304	156	68	0	50	50	50	50	50	50	18	0	0	0	0	0	1213
Emerald House, Newbury Business Park	Under construction	109	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	109
Bayer House, Strawberry Hill	Under construction	50	141	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	191
Bloor Homes, Southern River View House, Newbury Business Park	Prior approval granted	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
James Butcher House, 39 High Street	Under construction	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Sites identified through prior approval of 10+ dwellings at 31 March 2022		161	153	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	314
Permitted non-allocated small sites at 31 March 2022		131	243	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	387
Small sites identified through prior approval at 31 March 2022		13	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44
Subtotal: Existing planning commitments on unallocated sites		672	731	169	68	0	50	50	50	50	50	50	18	0	0	0	0	0	1958
Retained allocations from the Local Plan and Stratfield Mortimer NDP allocation																			
SP16 Sandleford Park Newbury - East	Outline permission allowed on appeal	0	0	0	100	100	100	100	100	100	100	100	100	100	80	0	0	0	1080
SP16 Sandleford Park Newbury - West	No permission	0	0	0	0	0	50	50	50	50	50	50	50	50	50	50	0	0	500
RSA1 - Land north of Newbury College, Monks Lane, Newbury	Full permission	0	0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	16
RSA2 - Land at Bath Road, Speen, Newbury	Outline permission on 107 units Full permission on 11 units	11	0	0	0	0	20	20	20	20	27	0	0	0	0	0	0	0	118
RSA3 - Land at Coley Farm, Stoney Lane, Newbury	Full permission	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75

Appendix 10 Housing Trajectory 2022/23 - 2038/39

	Planning status at 31 March 2022	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	TOTAL
RSA4 - Land off Greenham Road and New Road, South East Newbury	Full permission	0	50	50	57	0	0	0	0	0	0	0	0	0	0	0	0	0	157
RSA5 - Land at Lower Way, Thatcham	Full permission subject to conditions	0	30	50	11	0	0	0	0	0	0	0	0	0	0	0	0	0	91
RSA7 - 72 Purley Rise, Purley on Thames	Full permission	0	15	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29
RSA8 - Land adjacent to Bath Road and Dorking Way, Calcot	No permission	0	0	0	0	0	10	10	15	0	0	0	0	0	0	0	0	0	35
RSA9 - Land between A340 and The Green, Theale	Outline permission	0	0	0	0	0	20	20	20	20	24	0	0	0	0	0	0	0	104
RSA12 - Land adjoining Pondhouse Farm, Clayhill Road, Burghfield	Full permission	18	52	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100
RSA14 - Land adjoining Lynch Lane, Lambourn	No permission	0	0	0	0	0	20	20	20	0	0	0	0	0	0	0	0	0	60
RSA15 - Land at Newbury Road, Lambourn	Full permission	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	8
RSA18 - Pirbright Institute Site, High Street, Compton	Outline permission approved subject to s106 agreement	0	0	0	0	0	50	50	50	10	0	0	0	0	0	0	0	0	160
RSA20 - Land off Charlotte Close, Hermitage	Full permission	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	16
RSA21 - Land to the south east of the Old Farmhouse, Hermitage	Outline permission	0	0	0	0	0	10	11	0	0	0	0	0	0	0	0	0	0	21
SMNDP - Land to the south of St John's School, The Street, Stratfield Mortimer	Under construction	6	10	40	26	0	0	0	0	0	0	0	0	0	0	0	0	0	82
Subtotal: Retained allocations from the Local Plan and Stratfield Mortimer NDP allocation		60	198	209	194	100	304	281	275	200	201	150	150	150	130	50	0	0	2652
Proposed New Allocations																			
SP17 North East Thatcham	No permission	0	0	0	0	0	0	0	150	150	150	150	150	150	150	150	150	150	1500
RSA10 - Whitehart Meadow, Theale	No permission	0	0	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	40
RSA11 - Former sewage treatment works, Theale	No permission	0	0	0	0	0	20	20	20	0	0	0	0	0	0	0	0	0	60
RSA13 - Land north of A4 Bath Road, Woolhampton	No permission	0	0	0	0	0	8	8	0	0	0	0	0	0	0	0	0	0	16
RSA16 - Land north of South End Road, Bradfield Southend	No permission	0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	20
RSA17 - Land at Chieveley Glebe	No permission	0	0	0	0	0	0	10	5	0	0	0	0	0	0	0	0	0	15
RSA19 - Land west of Spring Meadows, Great Shefford	No permission	0	0	0	0	0	8	7	0	0	0	0	0	0	0	0	0	0	15
RSA22 - Land adjacent Station Road, Hermitage	No permission	0	0	0	0	0	0	10	10	14	0	0	0	0	0	0	0	0	34
RSA23 - Land adjacent The Haven, Kintbury	No permission	0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	20
Subtotal: Proposed New Allocations		0	0	0	0	0	76	95	185	164	150	150	150	150	150	150	150	150	1720
Windfall allowance on small sites		0	0	0	129	140	140	140	140	140	140	140	140	140	140	140	140	140	1949
Existing planning commitments for C2 Use Class communal accommodation		11	46	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	57
Total Projected Completions		1043	1150	528	487	240	570	566	650	554	541	490	458	440	420	340	290	290	9057
Cumulative Completions (A)		1043	2193	2721	3208	3448	4018	4584	5234	5788	6329	6819	7277	7717	8137	8477	8767	9057	
PLAN - Housing requirement 538 dpa (LHN 513 dpa+5% buffer)		538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	
PLAN Cumulative requirement (B)		538	1076	1614	2152	2690	3228	3766	4304	4842	5380	5918	6456	6994	7532	8070	8608	9146	
MONITOR - No. dwellings above or below housing requirement (B-A)		505	1117	1107	1056	758	790	818	930	946	949	901	821	723	605	407	159	-89	
MANAGE - Annual requirement taking account of past/projected completions		538	506	464	459	457	475	466	415	391	373	402	388	374	357	336	335	379	

Appendix 3: Site deliverability forms

Appendix 2

5 Year Housing Land Supply Site Deliverability Forms

Core Strategy Development Plan Document Strategic Site Allocations

Newbury Racecourse Strategic Site Allocation

Part 2: Information on site deliverability

1. Site details		
Site address	Land south of Monks Lane, west of A339	
Number of residential units proposed	Net additional units	1080
	Gross (total) units	1080

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes Ref: 20/01238/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – works are ongoing to prepare Discharge of Condition applications for all the prior to submission of reserved matters conditions.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No – but under option (see below)
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – site to be developed by Bloor Homes Limited
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Bloor Homes Limited
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes – Bloor Homes Limited has an option agreement in place

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>No physical development has yet taken place.</p> <p>Start on site anticipated in April 2024.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	0
	2023/24	0
	2024/25	50
	2025/26	120
	2026/27	120
	2027/28	120
	2028/29	120
	2029/30	120
	2030/31	120
	2031/32	120
	2032/33	120
	2033/34	70
	2034/35	0
	2035/36	0
	2036/37	0
	2037/38	0
	2038/39	0
Post 2039		0

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

Planning and Technical approvals process are the key constraints on development moving forward promptly.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

Bloor Homes is committed to working with WBC to bring this site forward in a timely manner. Demand remains strong in the area.

10. Additional comments

Completed by: Robert White
Position: Director
Organisation: White Peak Planning Limited
Date: 29th September 2022

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Rebecca Humble			
Organisation (if relevant)	Pegasus Group (Planning)			
Representing (if applicable)	Donnington New Homes			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other (please specify)			

2. Ownership details					
Are you the current owner of the site?	No				
If YES, are you...	<table border="1"> <tr> <td>Sole owner</td> <td><input type="checkbox"/></td> <td>Part owner</td> <td><input type="checkbox"/></td> </tr> </table>	Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>
Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>		
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	[REDACTED] [REDACTED] [REDACTED]				
Has the landowner (or each owner) indicated support for development of the land?	Yes				

Part 2: Information on site deliverability

1. Site details		
Site address	Sandleford Park West, Warren Road, Newbury, RG14 6NH	
Number of residential units proposed	Net additional units	Up to 500
	Gross (total) units	Up to 500
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	An Outline application, reference 18/00828/OUTMAJ, was submitted to West Berkshire Council in 2018 however, to date, has not been approved.

Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Application/s for Reserved Matters approval would follow Outline approval.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Outline permission has been sought.
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability (please give details)

Is the landowner still supportive of the development of the site?	The landowners are wholly supportive of the development of Sandleford Park West
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	No
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Donnington New Homes which is owned by Mark Norgate
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)

In September, 2015, Bloor Homes submitted a planning application which covered the whole allocated site at Sandleford Park (including New Warren Farm) in outline, together with a detailed design of a first phase of the development in the northern part of the site adjoining Monks Lane. Bloor Homes' second application was submitted in early 2016 and was a fully detailed application for their first phase of development as a stand-alone proposal. Because Donnington New Homes were not party to either of those applications, the Council was not willing to approve them because they could not deliver the comprehensive development of the site. Both of those applications were refused in November 2017.

In December, 2016, Bloor Homes submitted a third planning application proposing up to 1,000 homes on the land under their control. Again, that application has been refused.

However, following the submission of Bloor Homes' third planning application, the Council contacted both Bloor Homes and Donnington New Homes separately and informed them that, whilst their preference remained for a single planning application, the Council may be willing to consider the delivery of the Sandleford Park development through two separate but linked planning applications if they could be convinced that the

comprehensive development of Sandleford Park could equally be delivered in that way. As a result, Bloor Homes and Donnington New Homes worked increasingly closely during 2017 and early 2018, and their commitment to working collaboratively was confirmed by the signed Memorandum of Understanding which accompanied applications submitted by both Donnington New Homes and Bloor Homes.

Discussions with the Council became drawn out and protracted with the Council citing need for a single application across the allocation as a key reason for its unwillingness to progress Donnington New Homes application, and also owing the changes in personnel within the Council. In 2020 Bloor submitted a further application which was refused. Bloor appealed that decision (and as a result the Council refused to progress the Donnington New Homes Outline application until Bloor Homes appeal was determined). In May 2022, the Secretary of State granted planning permission to develop part of the allocated site stating that the site did not need to be brought forwards through a single application. Donnington New Homes now intends to work towards achieving Outline planning permission taking into account the Secretary of State's decision.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	
	2024/25	Up to 120
	2025/26	Up to 120
	2026/27	Up to 120
	2027/28	Up to 120
	2028/29	Up to 20
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

The absence of a grant of planning permission by the Council is prohibitive to the development of the site.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

The site remains achievable, suitable and available for development.

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

See section 4 above.

10. Additional comments

Completed by: Rebecca Humble

Position: Associate

Organisation: Pegasus Group (Planning)

Date: 28.09.2022

**Housing Site Allocations Development Plan Document Allocations
Stratfield Mortimer Neighbourhood Development Plan Allocation**

HSA1
Land north of Newbury College, Monks Lane, Newbury

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Cole Bates			
Organisation <i>(if relevant)</i>	Feltham Properties Ltd			
Representing <i>(if applicable)</i>	N/A			
Address	<div style="background-color: black; width: 100px; height: 15px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div>			
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>			
Email	<div style="background-color: black; width: 250px; height: 15px;"></div>			
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	<input type="checkbox"/>	Yes	Part owner
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?				

Part 2: Information on site deliverability

1. Site details		
Site address	Land North of Just Learning Nursery, Monks Lane, Newbury	
Number of residential units proposed	Net additional units	
	Gross (total) units	16

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes – 19/00669/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes – 20/00346/RESMAJ
	No. Please indicate what progress has been made on a full application	

	and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
No progress. Pre-app submission made (June 2022) incorporating additional land and increased number of dwellings.

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	

Post 2039	
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6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

Planning delay on revised site / scheme.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

Housing market likely to cool off due to cost of living crisis and mortgage uncertainty.

10. Additional comments

Completed by: Cole Bates

Position: Development Analyst

Organisation: Feltham Properties Ltd

Date: 28-09-2022

HSA2

Land at Bath Road, Speen, Newbury

Agent contacted and no response received.

HSA3

Land at Coley Farm, Stoney Lane, Newbury

Agent contacted and no response received.

HSA4 (NEW047 B)
Land west of New Road, North of Pyle Hill, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the West of New Road, Greenham, Newbury	
Number of residential units proposed	Net additional units	36
	Gross (total) units	36

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	18/00529/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharged	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	Individual completed properties are for sale
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Build completion achieved on 25 units</p> <p>Remainder due to be completed within the next 3 months</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	36
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
N/A

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
N/A

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

-

10. Additional comments

-

Completed by: James Bull

Position: Director

Organisation: Rivar Ltd

Date: 12.9.2022

HSA4 (NEW047 D)
Land to the North of Pinchington Lane, Greenham, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the North of Pinchington Lane Greenham Newbury	
Number of residential units proposed	Net additional units	157
	Gross (total) units	157
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	17/01096/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	20/02546/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, applications pending	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	The landowner is
Is the site currently for sale or being marketed by a land agent?	Recently sold
Is there current interest from a developer?	Recently sold
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

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5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
N/A

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

-

10. Additional comments

-

Completed by: James Bull

Position: Director

Organisation: Rivar Ltd

Date: 12.9.2022

HSA5
Land at Lower Way, Thatcham

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Lower Way, Thatcham	
Number of residential units proposed	Net additional units	91
	Gross (total) units	91

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Pending a resolution to grant
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	18/00964/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Background work has been undertaken as far as possible in advance of the decision being issued.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No – but we have a option to purchase
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes Persimmon will deliver the development
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>

5. Anticipated annual build out rates		
Up to 2039	2022/23	0
	2023/24	30
	2024/25	50
	2025/26	11
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>The prompt discharge of pre-commencement conditions</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>n/a</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

n/a

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

n/a to this form.

10. Additional comments

Completed by: L Jackson

Position: Head of Planning

Organisation: Persimmon Homes

Date: 13.09.22

HSA 7
St Gabriel's Farm, The Ridge, Cold Ash

Part 2: Information on site deliverability

1. Site details		
Site address	St Gabriels Farm, The Ridge, Cold Ash	
Site size (ha)		
Number of residential units proposed	Net additional units	5
	Gross (total) units	5
	Number of Affordable Homes	0

2. Planning status			
Is the site allocated in the Development Plan?	Yes	<input checked="" type="checkbox"/>	No
Does the site have planning permission?			Application Reference
	Outline		Yes:16/02529/OUTD
	Reserved Matters		Yes: 19/00832/REM
	Full		
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	No. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Construction underway		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning	

permissions?	
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4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Construction commenced – units to be delivered mid\late 2023.

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	0
	2022/23	2
	2023/24	3
	2024/25	0
	2025/26	0
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies _____

Position: Director _____

Organisation: T A Fisher & Sons Ltd

Date: 6th September 2022

HSA 9
Proposed Care Home at Stonehams Farm, Tilehurst

Part 2: Information on site deliverability

1. Site details		
Site address	Stoneham's Farm, Long Lane, Tilehurst	
Number of residential units proposed	Net additional units	0
	Gross (total) units	0

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Full Planning Approval
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	No
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Started on site Sept 22

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	✓
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

None

Completed by: Grant Jensen

Position: Senior Property Development Manager

Organisation: Barchester Healthcare Ltd

Date: 29th September 2022

HSA 10
Stonehams Farm, Tilehurst

Part 2: Information on site deliverability

1. Site details		
Site address	STONEHAM PARK, TILEHURST, READING, RG31 5BP	
Number of residential units proposed	Net additional units	
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	YES 19/01667/COND1
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	YES 19/02680COND2
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	YES 19/02680COND2
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	YES ALL ON A PLANNING TRACKER	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	YES AND IS IN PROGRESS WITH 32 PLOTS NOW HANDED OVER
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	N/A
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>We have all foundations now in, 32 are occupied, 7 more are expected to be occupied by the 31.12.2022 The rest in first 6 months of 2023</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	All completed June 2023
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
None we are aware of

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
no

8. Are you actively considering alternative types of development for the site? <i>Please give details</i>
N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: MR GRAHAM DENTON

Position: MD

Organisation: DARCLIFFE HOMES LIMITED

Date: 5th September, 2022

HSA 11
72 Purley Rise, Purley On Thames

Part 2: Information on site deliverability

1. Site details		
Site address	72 Purley Rise, Purley on Thames, RG8 8DH	
Number of residential units proposed	Net additional units	30
	Gross (total) units	31

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	18/00878/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	21/00776/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, multiple conditions have been discharged or submitted for discharge.	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a

Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?

No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*)

No progress. RM has been submitted and conditions are being discharged to be able to start on site in the near future. Partly because of current high build costs, we are looking to delay the start date on site until approximately mid next year.

5. Anticipated annual build out rates

Up to 2039

2022/23

2023/24

Circa 15

2024/25

Circa 16

2025/26

2026/27

2027/28

2028/29

2029/30

2030/31

2031/32

2032/33

2033/34

2034/35

2035/36

2036/37

2037/38

2038/39

Post 2039

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

Yes there are multiple potential external influences such as rising build costs, rising interest rates and changes in house prices which could affect the timing of the development.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

No

Completed by: George Andrews

Position: Land & Planning Assistant

Organisation: Shanly Homes

Date: 05/10/22

HSA 12
Land adjacent to Junction 12 of M4, Bath Road, Calcot

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Dorking Way, Calcot	
Number of residential units proposed	Net additional units	199
	Gross (total) units	199
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes. 19/01544/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharged	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Site is under construction.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	43 market, 41 affordable
	2023/24	16 market
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>No</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Pippa Paton

Position: Graduate Planning

Organisation: Bellway Homes, (Thames Valley)

Date: 04/10/2022

HSA 13
Land adjacent to Bath Road and Dorking Way, Calcot

Part 2: Information on site deliverability

1. Site details		
Site address	Land Adj Bath Road and Dorking Way, Calcot	
Number of residential units proposed	Net additional units	9
	Gross (total) units	9

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Live Applications 17/02904/OUTMAJ and 22/01836/FULEXT. The full application is for a Care Home. This will look to be commenced as soon as permission is granted. The outline application will be subject to further planning submissions for reserved matters.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	Up to 9 dwellings
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
None within the client/land owners control.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

Yes – Large part of the site is proposed for the erection of a 70-bed Care Home

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Abi Peacock

Position: Planner

Organisation: Walsingham Planning

Date: 28/09/2022

HSA 14
Field between A340 & The Green, Theale

Part 2: Information on site deliverability

1. Site details		
Site address	Land between the A340 and The Green, Theale	
Number of residential units proposed	Net additional units	104
	Gross (total) units	104

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes – 19/01172/OUTMAJ granted on 15th December 2020
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	An application for reserved matters is likely to be submitted in 2023 following appointment of a developer.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See above
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking	No

to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	Yes
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)

Outline planning permission for residential development of up to 104 dwellings was granted in December 2020. A developer is expected to be appointed shortly. Following appointment of a developer and subject to reserved matters approval, it is anticipated that development could commence in 2023/24.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	
	2024/25	25
	2025/26	50
	2026/27	29
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Jonathan Sebbage

Position: Associate Planner

Organisation: Savills

Date: 02 / 09 / 2022

HSA 15

Land adjoining Pondhouse Farm, Clay Hill Road, Burghfield Common

Part 2: Information on site deliverability

1. Site details		
Site address	Land adj Pondhouse Farm, Clay hill Road, Burghfield Common	
Number of residential units proposed	Net additional units	100
	Gross (total) units	100

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes 18/02485/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes 22/00325/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes Condition 8 discharged, following condition discharge applications have been submitted for conditions; 6, 7, 8, 9, 10, 11, 13, 16, 19, 24, 12,14, 17, 20, 25, 2, 3, 4 and 13 which are pending consideration.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Start on site is anticipated in November 2022</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	18
	2023/24	52
	2024/25	30
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: Ed Barton

Position: Land Negotiator

Organisation: Croudace Homes

Date: 28th September 2022

HSA 17
Land to the north of A4, Woolhampton

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the north of A4 Bath Road, Woolhampton	
	<ul style="list-style-type: none"> Planning application ref: 16/01760/OUTMAJ; 18/00997/RESMAJ; 19/00772/RESMAJ Local Plan policy ref: HSA17 	
Number of residential units proposed	Net additional units	35 - not proposed, as built and completed
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Completed site
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability *(please give details)***Is the landowner still supportive of the development of the site?****Is the site owned by a developer?****Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?****Is the site currently for sale or being marketed by a land agent?****Is there current interest from a developer?****Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?****4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated** *(please give details)*

5. Anticipated annual build out rates		
Up to 2039	2022/23	Completed site
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>

8. Are you actively considering alternative types of development for the site? *Please give details*

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: Guy West

Position: MD

Organisation: Westbuild Homes

Date: 5 September 2022

HSA 18
Land east of Salisbury Road, Hungerford

Part 2: Information on site deliverability

1. Site details		
Site address	Salisbury Road, Hungerford, West Bekrshire. RG17 0LR	
Number of residential units proposed	Net additional units	
	Gross (total) units	100
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	16/03061/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	19/01406/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	???
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes. All Outline & Reserved Matters Conditions have been discharged	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

95 units complete. 5 roofed in and near completion

5. Anticipated annual build out rates		
Up to 2039	2022/23	100
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>No</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Matthew Brook

Position: Technical Manager

Organisation: Bewley Homes

Date: 05/10/2022

HSA 19
Land adjoining Lynch Lane, Lambourn

Part 2: Information on site deliverability

1. Site details		
Site address	Land adjoining Lynch Lane, Lambourn, Hungerford, Berkshire, RG17 8QG	
Number of residential units proposed	Net additional units	80 - 105
	Gross (total) units	80 - 105
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below 'Site Promotion Activity : Summary' for detailed information.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Does the site have full planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/a	

Site Promotion Activity : Summary

The applicant has engaged in pre-application discussions with the Local Planning Authority (pre-application reference: 20/00093/PREAPP). These have confirmed that the site is currently allocated within the Housing Site Allocations Development Plan Document (HSA DPD May 2017) so the principle of development is in accordance with Policy HSA19 and acceptable in policy terms. The pre-application response has recognised that further design work, to finalise an appropriate layout (and establish a sustainable number of units) in line with the Local Planning Authority's feedback, is needed. In response to this, the applicant is currently undertaking further design work / due diligence to revise the proposals. This is in order to front-load any requirements, to ensure the planning application process is straightforward – this underpins the applicant's aspiration to achieve a timely, favourable determination and commence development on the site to deliver much-needed residential development.

During the pre-application process, a response was also received from West Berkshire Council's Highways department. Positively, this response posed no objections in principle to the development proposals and recognised the allocated, thus acceptable-in-principle, nature of the site. Similarly, the Highways Department supported the provision of two access points serving the development. In this way, the acceptable nature of the site from a highways perspective, is evident. Whilst recognising that the quantum of development sought by the applicant is larger than the quantum of units allocated for development in the HSA DPD (May 2017), it must be noted that no objections have been raised by the Highways Department on unit numbers. Instead, the preparation of documentation to support a formal planning application (including a Transport Assessment, Travel Plan etc) has been recommended by the Highways Department to inform and justify the proposals.

In light of the positive feedback received both from the Local Planning Authority and the Highways Department, demonstrating the readily available nature of the site and its lack of constraints, the applicant is working on a scheme to take into account the comments received during the pre-application exercise. This work, which will be finalised imminently, will inform the layout submitted as part of the formal planning application. As the site is not subjected to planning constraints, and can readily accommodate residential development, the applicant is undertaking this substantial amount of work at this stage to front-load any planning requirement as much as possible. This is not only to ensure the robustness of the proposals but, ultimately, seeks to minimise delays in light of the unprecedented pressures Local Planning Authorities are experiencing. The applicant is looking to submit a planning application imminently and commence work on site within the next year / as soon as planning permission is achieved. The sole issue to resolve is the capacity of, and yield of, the site (unit numbers).

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes – Hygrove Homes Ltd
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – Hygrove Homes Ltd is looking to develop the site themselves
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Hygrove Homes Ltd. NB : Notwithstanding Hygrove Homes' interest and ownership of the site, considerable and strong interest has also been expressed from a number of parties.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
In light of the disruption caused by the pandemic, it is evident that the applicant's aspirations for the site have been somewhat delayed due to the unprecedented nature of the global events both the public and private sector have been subjected to. Notwithstanding this, as outlined in Section 2 (Planning Status) of this document, the applicant has spent the last year or so engaging in pre-application discussions with multiple interested parties, including (but not necessarily

limited to) the following: the Local Planning Authority; the Parish Council; Thames Water; Lambourn Trainers; Archaeologists; Ecologists; and the Highway Safety Team.

At present, the applicant is finalising the design element of the proposals. It is, therefore, anticipated for a planning application to be submitted imminently, and for development on site to begin within the next year, subject to planning.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	Nil – infrastructure provision
	2024/25	20
	2025/26	40
	2026/27	40
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

There are no issues affecting the achievability, economic viability or timing of the development of this site. The site is fully owned by Hygrove Homes Ltd who are committed to securing planning permission / developing the site and, crucially, have the funds to do so. In this way, given the inherent financial viability of any scheme brought forward, the uncomplicated ownership position and the allocation of the site for residential development, the site benefits from realistic prospects of being delivered within the plan period.

As recognised in Section 4 (Development Progress) of this site, whilst the Covid-19 pandemic has not impacted on the delivery on this site, it is evident that delays have been experienced across both the public and private sector not least in obtaining a pre-application response from the Local Planning Authority (July 2020) to the formal enquiry submitted by the applicant (May 2020). This exercise, the aim of which was to obtain a steer from the Local Planning Authority regarding the principle of development on the site took over three months. Whilst completely understandable, in light of the circumstances, it is evident that these delays have impacted upon the applicant's timescales. For this reason, to avoid being subjected to further delays, the applicant is now effectively front-loading a formal planning application submission to ensure all due diligence is undertaken and that the determination process can be as streamlined as possible in order to deliver much-needed new housing.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No – the applicant is committed to delivering high-quality residential development on site and is finalising the layout for the formal planning application in the interest of best-practice and a favourable determination for the proposals.

8. Are you actively considering alternative types of development for the site? Please give details

No – the site is suited for housing, as allocated.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

Overall, in light of the above, it is evident that the applicant is committed to working with the Local Planning Authority to deliver a comprehensive sustainable development, providing much-needed homes in West Berkshire. Ultimately, the site is suitable, available for development and considered to be in a sustainable location for residential development – this is demonstrated by the feedback received during the pre-application exercise, both by the Local Planning Authority and the Highways Department, and its current allocation in the HSA DPD (May 2017) which must be retained in the interest of residential delivery. It is not considered that the site has any constraints which could restrict development despite the ongoing effects of the Covid-19 pandemic – instead, the applicant has utilised the delays of the last 18 months to engage in pre-application discussions, finalise a robust layout in line with the local planning authority's aspirations, and to (imminently) submit a formal planning application. This is in order to commence development on the site as soon as possible so that this viable site can make a meaningful contribution to West Berkshire in terms of housing provision as well as associated health, wellbeing and community benefits in line with local and national Planning Policy.

10. Additional comments

The site is suitable, available, viable and deliverable for much needed housing.

Completed by: Geraint John
Position: Director
Organisation: Geraint John Planning Ltd
Date: 23rd September 2022

HSA 20
Land at Newbury Road, Lambourn

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Newbury Road, Lambourn	
Number of residential units proposed	Net additional units	5-8
	Gross (total) units	5-8
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	X – see below
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes - 20/00972/FULMAJ The site is also subject of a pending planning application ref: 22/00277/FULMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No, although the site is under offer by Palady Homes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – Palady Homes will be developing the site
Is the site currently for sale or being marketed by a land agent?	Yes and as above the site is under offer by Palady Homes
Is there current interest from a developer?	Yes as above
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	As above

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>As set out above the site has planning permission for 8 units although the site is subject to a subsequent planning application for 5 units. The application was submitted in February 2022, although little progress has been made with Officers to date and the site is now subject to being Nutrient Neutral.</p>

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5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	5 (subject to the grant of planning permission)
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>The main matter affecting the timing of development is the timing of a grant of planning permission for the 5 unit scheme.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

No

Completed by: Kerry Pfleger

Position: Director

Organisation: RAW Planning Ltd

Date: 04.10.2022

HSA22
Land off Stretton Close, Bradfield Southend

Part 2: Information on site deliverability

1. Site details		
Site address	<i>Land off Stretton Close, Bradfield,</i> <ul style="list-style-type: none"> • Planning application ref: 20/02410/RESMAJ and 17/03411/OUTMAJ • Local Plan policy ref: HSA22 	
Number of residential units proposed	Net additional units	11
	Gross (total) units	11

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	SITE HALF WAY THROUGH CONSTRUCTION	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>4 PLOTS WILL BE BUILT AND SOLD THIS YEAR WITH THE REMAINDER NEXT YEAR. (Half way through construction)</p>

5. Anticipated annual build out rates

Up to 2039	2022/23	4
	2023/24	7
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details**7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details**

8. Are you actively considering alternative types of development for the site? *Please give details*

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: GUY WEST

Position: MD

Organisation: WESTBUILD HOMES

Date: 5/9/22

HSA23
Pirbright Institute Site, High Street, Compton

Part 2: Information on site deliverability

1. Site details		
Site address	Former Pirbright Institute, High Street, Compton, Newbury, RG20 6NY	
Number of residential units proposed	Net additional units	160
	Gross (total) units	160

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	20/01336 Awaiting final engrossments of s106 agreement and issuing of decision notice
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	TBC following disposal process which is ongoing RM to be submitted by developer following demolition works (being carried out by Homes England)
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/a	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes via Homes England Development Partner
Is the site currently for sale or being marketed by a land agent?	Yes
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Not at this stage however bids close imminently which will lead to decision making and an Agreement for Lease

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>A hybrid planning application is pending imminent determination. The application seeks full permission to undertake extensive demolition and remediation work to de-risk and unlock the site together with outline permission for up to 160 homes.</p> <p>Work to procure a specialist works contractor has concluded and they are mobilising pending issuing of the planning decision. Work to prepare an EPSML for submission to Natural England is at an advanced stage.</p> <p>It is anticipated that a Development Partner will be selected during the latter part of FY22/23. Once selected, and whilst the enabling works are underway, they will seek to secure Reserved Matters consent. Following completion of the works, they will take control of the site and commence delivery at pace.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	50

	2025/26	50
	2026/27	60
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

n/a

Completed by: Mike Harris

Position: Senior Planning & Enabling Manager

Organisation: Homes England

Date: 28/09/2022

HSA24
Land off Charlotte Close, Hermitage

Part 2: Information on site deliverability

1. Site details		
Site address	Land off Charlotte Close, Hermitage, Thatcham	
Number of residential units proposed	Net additional units	16
	Gross (total) units	16

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. Please see below.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. Please see below.
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes. Reference 20/00912/FULEXT.
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharge of conditions applications have been submitted, with application 22/01039/COND1 outstanding at time of writing.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes.
Is the site owned by a developer?	Yes. Deanfield Homes Limited.
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Development will be built out by Deanfield Homes.
Is the site currently for sale or being marketed by a land agent?	No.
Is there current interest from a developer?	See above.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A.

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
Full planning permission has been granted and progress has been made on the subsequent discharge of conditions.

5. Anticipated annual build out rates		
Up to 2039	2022/23	Development anticipated to commence in Oct '22.
	2023/24	16 dwellings.
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>Delays encountered in receiving the discharge of conditions approvals from the Council are delaying commencement of this site.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No.</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No.

10. Additional comments

No.

Completed by: Simon Handy

Position: Director – Head of Oxford Planning

Organisation: Strutt & Parker

Date: 15/09/2022

HSA25

Land to the south east of the Old Farmhouse, Hermitage

Part 2: Information on site deliverability

1. Site details		
Site address	The Old Farmhouse, Newbury Road, Hermitage	
Site size (ha)		
Number of residential units proposed	Net additional units	21
	Gross (total) units	21
	Number of Affordable Homes	8

2. Planning status			
Is the site allocated in the Development Plan?	Yes	x	No
Does the site have planning permission?			Application Reference
	Outline		17/03290/OUTMAJ
	Reserved Matters		No
	Full		No
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.	RM submitted.		
Does the site have prior approval for change of use to residential?	No. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Delays due to WBC refusing s.73 application to amend the parameters plan necessitating a needless appeal resulting in costs being awarded against the Council and needless delays in delivery.

Site start anticipated Spring '22 assuming WBC approve the RM application.

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	
	2021/22	
	2022/23	
	2023/24	
	2024/25	16
	2025/26	5
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S J Davies _____

Position: _____ Director _____

Organisation: T A Fisher & Sons Ltd _____

Date: 6th September 2022 _____

Stratfield Mortimer Neighbourhood Plan Allocation
Land to the south of St. John's School, The Street, Mortimer

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the South of The Street, Mortimer Common	
Site size (ha)		
Number of residential units proposed	Net additional units	110
	Gross (total) units	110
	Number of Affordable Homes	44

2. Planning status			
Is the site allocated in the Development Plan?	Yes	<input checked="" type="checkbox"/>	No
Does the site have planning permission?			Application Reference
	Outline		17/03004/OUTMAJ
	Reserved Matters		Phase 1 (28 of 110) Approved Phase 2a (16 of 110) Approved Phase 2b (14 of 110) Approved
	Full		
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.	Phase 1, 2a & 2b approved (58 of 110) Phase 3 to be submitted later this year.		
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre-commencement conditions on Phase 2a discharged		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the	

landowner dependent on the site gaining residential planning permissions?	
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4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Phase 1 (28 units) build complete. Phase 2a (16 units) under construction. Phase 2b to commence late 2022

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	11
	2022/23	23
	2023/24	10
	2024/25	40
	2025/26	26
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies

Position: Director

Organisation: T A Fisher & Sons

Date: 6th September 2022

Large and Medium Sites with Planning Permission at March 2022

16/02330/FULEXT
Beansheaf Farm, Bourne Close, Holybrook

Part 2: Information on site deliverability

1. Site details		
Site address	Beansheaf Farm, Old Grange Close Calcot Reading, RG31	
Number of residential units proposed	Net additional units	27 (24 completed and 21 sold)
	Gross (total) units	

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No we have full planning – see below
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No we have full planning – see below
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes (18/02937/FULEXT)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, only 1 outstanding condition	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Currently in development (almost complete)
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	No
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>24 units out of 27 have been completed and 21 sold.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>	
No	

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>	
No	

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Rachel Taylor

Position: Executive Assistant

Organisation: Beansheaf Developments Number One Limited

Date: 28th September 2022

16/00547/FULEXT
Market Street, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Market St, Newbury	
Number of residential units proposed	Net additional units	
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes, 16/00547/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	Lettings are being marketed direct and through Agents
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Out of a 7 phases, of which 5 are residential; 1 non-residential section has been completed (the Market Street Car Park).

Additionally Phase 1 which consists of 2 blocks (A – Bambooo; and C, Purl House) have been delivered.

Other phases are in progress and due to complete between Oct 22 and July 23

5. Anticipated annual build out rates		
Up to 2039	2022/23	34 – completed 26 in Dec22 / Jan 23 113 – Mar 23
	2023/24	59 Jun 23
	2024/25	0
	2025/26	0
	2026/27	0
	2027/28	0
	2028/29	0
	2029/30	0
	2030/31	0
	2031/32	0
	2032/33	0
	2033/34	0
	2034/35	0
	2035/36	0
	2036/37	0
	2037/38	0
	2038/39	0
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>Timing is only dependant on availability of resources (labour and materials)</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

None

Completed by: Cullum Alexander

Position: Associate Director – Direct Development

Organisation: Grainger

Date: 30/09/22

19/02140/FULMAJ
Westminster House, Bath Road

Part 2: Information on site deliverability

1. Site details		
Site address	Westminster House, Bath Road Padworth	
Number of residential units proposed	Net additional units	13
	Gross (total) units	13
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	19/02140/FULMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre commencement conditions discharged. Negotiating revision to S106	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
Construction on site commenced, completion due 3 rd quarter 2023

5. Anticipated annual build out rates		
Up to 2039	2022/23	All Units (13)
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>Specification changes and cost and increases are threatening viability. Need to use Air Source Heat Pumps.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>See above</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

Current uncertainty may influence completion date

10. Additional comments

Completed by: Mark Barrett

Position: Chairman

Organisation: Gables Homes Ltd

Date: 3-10-2022

18/03061/RESMAJ

14/02480/OUTMAJ

Land adjacent to Hilltop, Oxford Road, Donnington, Newbury: West

Part 2: Information on site deliverability

1. Site details		
Site address	Donnington Heights, North Newbury, Land to the North of A339, RG14 2FN	
Number of residential units proposed	Net additional units	
	Gross (total) units	222
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes 19/00442/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes 20/02788/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes 14/02480/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Plots 1-34 and 179-197 are constructed to roof (53 plots), rising on brickwork with Plots 134-178 (45 plots). 50% of services are in and 90% of adoptable roads have been installed but only around 25% are surfaced.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	60 up to March 2023
	2023/24	55 up to March 2024
	2024/25	55 up to March 2025
	2025/26	52 up to March 2026
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>	
No	

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>	
No	

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Ryan Chapman

Position: Technical Manager

Organisation: David Wilson Homes

Date: 06.10.2022

18/03209/FULEXT
19 and 19A High Street, Theale

Part 2: Information on site deliverability

1. Site details		
Site address	19 & 19a High Street, Theale	
Site size (ha)		
Number of residential units proposed	Net additional units	15
	Gross (total) units	15
	Number of Affordable Homes	0

2. Planning status			
Is the site allocated in the Development Plan?	Yes		No x
Does the site have planning permission?			Application Reference
	Outline		
	Reserved Matters		
	Full		APP/W0340/W/19/3243107
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre-commencement conditions cleared		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Under construction

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	0
	2022/23	0
	2023/24	0
	2024/25	15
	2025/26	0
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies

Position: Director

Organisation: T A Fisher & Sons

Date: 6th September
2022 _____

**Sites identified through the Prior Approval process (10 or more dwellings)
at March 2022**

18/00631/PACOU
18/02279/PACOU
Emerald House, Newbury Business Park

From: Mountley Group <[REDACTED]>
Sent: 02 September 2022 15:50
To: PlanningPolicy
Subject: Re: West Berkshire Council Housing Trajectory & Five Year Housing Land Supply

Follow Up Flag: Follow up
Flag Status: Flagged

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

***Emerald House, Newbury Business Park, Newbury 109 FLAT READY IN OCTOBER 2022
NO OTHERS***

Thank you , kind regards



Hersch Schneck

Director

p: [REDACTED]

a: [REDACTED]

w: www.mountley.co.uk e: [REDACTED]

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On Fri, 2 Sept 2022 at 15:23, PlanningPolicy <PlanningPolicy@westberks.gov.uk> wrote:

Dear Developer,

West Berkshire Council are commencing an update of the five year housing land supply. National planning policy requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.

In addition, the Council are preparing a housing trajectory to inform the West Berkshire Local Plan Review to 2039. The housing trajectory will demonstrate how the anticipated housing delivery (which will include allocated sites and non-allocated sites with planning permission) will meet the housing requirement.

In order to ensure that the Council's assessment of the deliverability of sites is robust, we would be grateful if you could please complete the attached form for the following site, and return it by email to the Planning Policy Team by **5pm on Friday 30 September 2022:**

- Site name: *Emerald House, Newbury Business Park, Newbury*
- Planning application ref: *18/00631/PACOU and 18/02279/PACOU*
- Local Plan policy ref: *N/A*

If you have any queries about this request, please do not hesitate to get in touch.

With thanks in advance.

Kind regards,

Planning Policy Team

Development and Regulation | West Berkshire Council | Market Street | Newbury | RG14 5LD

01635 519 111 | planningpolicy@westberks.gov.uk

<https://info.westberks.gov.uk/planningpolicy>

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18/01904/PACOU
Bayer House, Strawberry Hill

Part 2: Information on site deliverability

1. Site details		
Site address	Bayer House Strawberry Hill Newbury RG14 1JA	
Site size (ha)	1.45687 Hectares	
Number of residential units proposed	Net additional units	
	Gross (total) units	191 Apartments as per Planning Application
	Number of Affordable Homes	N/A

2. Planning status			
Is the site allocated in the Development Plan?	Yes	X	No
Does the site have planning permission?			Application Reference
	Outline		
	Reserved Matters		
	Full		18/01904/PACOU - Granted
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		18/01904/PACOU - Granted
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – Pre-commencement Condition No 6 Discharged – Planning Ref: - 21/01287/COND1		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning	No

permissions?

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Strip-out has been completed. Looking to commence development early 2022

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2027	2021/22	£1 Million
	2022/23	£12.3 Million
	2023/24	
	2024/25	
	2025/26	
	2026/27	
Post 2027	2027 – 2032	
	2032 -2038	
	Beyond 2038	

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

Yes – timing due to resources.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

Completed by: _____ Natalie Sawbridge _____

Position: _____ Administrator _____

Organisation: _____ Empire Property Concepts _____

Date: _____ 15-11-2021 _____

Appendix 8 – Written Statements for Matter 6

West Berkshire Council

Local Plan Review 2022-2039

Local Plan Review 2022-2039 Examination

Written Statement for Matter 6

Non-strategic housing allocations

March 2024

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

West Berkshire Council

Written Statement for Matter 6: Non strategic housing allocations

Response to each question raised by the Inspector:

M6.1 Non strategic allocations: Newbury and Thatcham

RSA1 Newbury College, Newbury (15 dwellings)

Q6.1. Is there a reasonable prospect that allocation RSA1 will be available and at least 15 dwellings could be viably developed during the plan period?

- 1.1. Yes, there is a reasonable prospect that the allocation will be available and at least 15 dwellings could be viably developed during the plan period.
- 1.2. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.3. The site benefits from both outline and reserved matters planning permission (19/00669/OUTMAJ and 20/00346/RESMAJ) for up to 16 dwellings. The developer stated that there was a delay to the commencement of the proposed development due to the submission of a revised scheme to incorporate additional land and increase the number of dwellings. As at 31 March 2022, no planning application for the revised scheme had been submitted by the developer. However, an outline planning application (23/01732/OUTMAJ) was submitted and validated in July 2023, and is currently pending determination. The revised scheme is for a larger quantum of development (31 dwellings) which includes additional land (inside the settlement boundary) adjacent to the allocated site.
- 1.4. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.5. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and at least 15 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.2. Are the development parameters in policy RSA1 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

- 1.6. Yes, the Council considers that with the modifications proposed below, the development parameters are justified and will be effective in achieving sustainable development if the current planning permission is not implemented. The Inspector who examined the adopted Housing Site Allocations Development Plan Document (HSA DPD, [SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.7. The site is located within Newbury. Newbury is the main urban area of West Berkshire, within the Newbury and Thatcham spatial area. It is therefore a sustainable location which is, in principle acceptable for further development.
- 1.8. Most of the development parameters included within policy RSA1 have been retained from policy HSA1 of the HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.9. Appendix 8a (pp. 2-5) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.10. The development potential of the scheme is based on the developable area of the site as informed by technical work and the standard density that was set out in the Council's Strategic Housing Land Availability Assessment (SHLAA, which was prepared as part of the work on the HSA DPD).
- 1.11. The site is in close proximity to the A339, and therefore, an air quality survey is required to advise on any mitigation measures required to ensure air quality levels on the site are kept to an acceptable level.
- 1.12. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the RSA policies, proposes a minor modification to the policy as follows:

~~"d) Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site~~ the archaeological assessment already undertaken of the site."
- 1.13. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“e) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”

- 1.14. The site is adjacent to the strategic Sandleford Park allocation (policy SP16). Therefore, development on this site needs to take account of the proposals for Sandleford Park.
- 1.15. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy in the LPR to ensure that development contributes to this aim.
- 1.16. Access to the site will share access to Newbury College and the public house/restaurant adjacent to the site, therefore, it is important that any development on the site considers what road safety and traffic calming measures will be required to ensure safe access to all locations is retained.
- 1.17. The provision of links to existing footpaths and cycleways will help to increase the permeability of the site and further integrate into the neighbouring community.
- 1.18. Due to the site’s location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

RSA2 Bath Road, Speen (100 dwellings)

Q6.3. Is there a reasonable prospect that allocation RSA2 will be available and at least 100 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be in place and operational?

- 1.19. Yes, there is a reasonable prospect that the allocation will be available and at least 100 dwellings could be viably developed during the plan period.
- 1.20. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.21. The site benefits from a hybrid planning permission (17/02092/OUTMAJ). The full planning permission element is for 11 dwellings, whilst the outline element is for 93 dwellings. There is an outline planning permission (17/02093/OUTMAJ) for 14 dwellings on the part of the site off Lambourn

Road. As at 31 March 2022, no planning application for the reserved matters had been permitted on site. However, Reserved Matters applications for 93 dwellings (22/01235/RESMAJ) and 14 dwellings (23/00373/RESMAJ) were approved in February 2024 subject to conditions.

- 1.22. The site is owned by a developer who has confirmed that there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.23. The site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 118 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.24. Regarding nutrient neutrality, in October 2023 the Council received confirmation from Thames Water that the foul sewers to which the development will connect are connected to the Newbury Wastewater Treatment Work (WwTW). In November 2023 confirmation was also received that the Newbury WwTW has the capacity to treat all the foul wastewater from the development. There will therefore be no likely significant effects on the River Lambourn Special Area of Conservation from the treatment and discharge of foul wastewater (see Appendix A). It is therefore unlikely that any mitigation will be required to achieve nutrient neutrality.

Q6.4. Are the development parameters in policy RSA2 justified, and will they be effective in achieving sustainable development on the site? In particular, is a main modification required to ensure policy RSA2 is effective with regard to the Speen Conservation Area?

- 1.25. Yes, the Council considers that with the modification proposed below, development parameters are justified and will be effective in achieving sustainable development.
- 1.26. Appendix 8a (pp. 6-9) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.27. The site is located within Newbury. Newbury is the main urban area of West Berkshire, within the Newbury and Thatcham spatial area. It is therefore a sustainable location which is, in principle, acceptable for further development.
- 1.28. Most of the development parameters included within policy RSA2 have been retained from policy HSA2 of the adopted HSA DPD ([SD2](#)). They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.

- 1.29. The development potential of the scheme is based on the developable area of the site as informed by technical work and the standard density that was set out in the Council's SHLAA (which was prepared as part of the work on the HSA DPD).
- 1.30. Landscape Capacity Assessment work ([LAN5f](#)) was prepared due to the site's location in the setting of the North Wessex Downs AONB. The recommendations of the LCA have been included within the policy, which also requires a full detailed Landscape and Visual Impact Assessment (LVIA), including consideration of the heritage setting of the site to ensure that the site's sensitive location is respected. The location of the access to the site will ultimately be informed by the LVIA.
- 1.31. The site is located close to the A34 and therefore, noise and air quality surveys are required to advise on what mitigation may need to be provided on the site.
- 1.32. The site is within the area of the Second Battle of Newbury, as defined by research undertaken as part of a local listing application. Whilst this is not a Registered Battlefield, nor currently a locally listed heritage asset, there is still potential for multi-period archaeological evidence on the site. Because of the nature of the heritage asset, field evaluation will be required in addition to a desk-based assessment.
- 1.33. The old reservoir part of the site is previously developed land, and thereby reduces the amount of development taking place on greenfield land. This would potentially reduce the impact on any in situ archaeological evidence.
- 1.34. As a large part of the site is greenfield, there is the potential for protected species to be present. The policy within the HSA DPD required an extended phase 1 habitat assessment to ensure any protected species are not adversely affected. This has now been changed to an Ecological Impact Assessment (EclA) following representations by Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) to the Regulation 18 consultation on the emerging draft LPR.
- 1.35. Due to the site's location within the River Lambourn SAC Nutrient Neutrality Zone, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.36. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- “g) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a

strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.
Development will be occupied in line with this strategy;”

- 1.37. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.38. Retention of rights of way across the site will ensure that there is no negative impact on green infrastructure, as well as increasing the permeability of the site.
- 1.39. Retention of the allotments in situ is a response to the preferred options consultation on the HSA DPD, where substantial concerns were raised about the initial proposal to relocate the allotments. The LCA also advises that the allotments are to be retained in situ to conserve and enhance the landscape edge to Speen and to retain the character of Speen and West Newbury. Further landscape work was carried out in relation to access to the site and the potential for a small amount of development on the reservoir part of the site. Access and limited development is not completely ruled out, but would be subject to landscape constraints to protect the rural edge of Speen, and a reduction in the level of development elsewhere on the site. The policy already states that vehicular access options are to be fully explored, and include an access from Bath Road, with the final choice of access, and the site design and layout being informed by a LVIA. Development of the reservoir site would result in development on previously developed land, reducing the amount of greenfield land to be developed on this site.
- 1.40. Due to the site’s proximity to the Speen Conservation Area and the potential archaeological interest in the site, development is required to consider the architectural and historic interest of Speen. The Council has now agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes both minor and main modifications to the policy as follows:

“d) Informed by ~~an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site~~ the archaeological assessment already undertaken of the site.

h) iii) A tree planted landscape buffer to the A34, slip road and A4 to maintain the rural and historic character of the western approach into Newbury;

j) Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area. Particular attention will be paid to the design of the scheme when approaching the Conservation Area along Bath Road, responding sensitively to the character, density and scale of existing development.”

- 1.41. The Council is preparing a Statement of Common Ground with the Environment Agency and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.”

- 1.42. Due to the site’s location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.
- 1.43. There is an oil pipeline which runs from across the northern part of the site. A Construction and Operations Management Plan is required to safeguard the oil pipeline from operational works.

RSA3 Coley Farm, Newbury (75 dwellings)

<p>Q6.5. Is there clear evidence to indicate that 75 dwellings will not be built on allocation RSA3 by 2026/7?</p>

- 1.44. No, the Council does not consider there is clear evidence which indicates that 75 dwellings will not be built on the site by 2026/27.
- 1.45. The site benefits from full planning permission for 75 dwellings (20/00604/FULEXT). Development commenced in June 2023 and is currently under construction.
- 1.46. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 75 dwellings could be viably delivered by 2026/27. This is considered realistic.
- 1.47. Coley Farm is an allocation in the adopted HSA DPD ([SD2](#)). The submission version of the LPR ([CD1](#)) retained residential allocations from the current Local Plan which were either not built out or which were not nearing completion.
- 1.48. Development commenced in June 2023, and a site visit undertaken in February 2024 confirms that development is at an advanced stage of construction. The site is also being promoted on the developer’s website with a launch date of early 2024 identified (see Appendix B).
- 1.49. The Council therefore proposes a main modification to the LPR to remove policy RSA3. Subsequent main modifications are also proposed to policy SP12 and the housing trajectory to include the outstanding number of

dwellings within the supply category ‘Local Plan allocations not being retained due to site being at an advanced stage of construction’.

Q6.6. Are the development parameters in policy RSA3 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

- 1.50. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The current planning permission is being implemented. The development parameters have been followed through the development management process to ensure the proposed development can achieve sustainable development.

RSA4 Greenham Road, Newbury (160 dwellings)

Q6.7. Is there clear evidence to indicate that 160 dwellings will not be built on allocation RSA4 by 2026/27?

- 1.51. No, there is not clear evidence to indicate that 160 dwellings will not be built on the site by 2026/27.
- 1.52. The site benefits from both outline (17/01096/OUTMAJ) and reserved matters (20/02546/RESMAJ) planning permission for 157 dwellings. Development commenced in September 2022 and is currently under construction.
- 1.53. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.54. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 160 dwellings could be viably delivered by 2026/27. This is considered realistic.
- 1.55. Greenham Road in Newbury is an allocation in the adopted HSA DPD ([SD2](#)). The submission version of the LPR ([CD1](#)) retains residential allocations from the current Local Plan which were either not built out or which were not nearing completion.
- 1.56. Development commenced in September 2022, and a site visit undertaken in February 2024 confirms that development is at an advanced stage of construction. The site is also being marketed (see Appendix C).
- 1.57. A main modification is therefore proposed to remove the site as an allocation. Subsequent main modifications are also proposed to policy SP12 and the

housing trajectory to include the outstanding number of dwellings within the supply category 'Local Plan allocations not being retained due to site being at an advanced stage of construction'.

Q6.8. Are the development parameters in policy RSA4 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

1.58. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The current planning permission is being implemented. The development parameters have been followed through the development management process to ensure the proposed development can achieve sustainable development.

Q6.9. Is the Newbury settlement boundary defined on the policies map justified in relation to the allocation, and will it be effective in the implementation of policy RSA4?

1.59. Yes, the settlement boundary is justified. The Settlement Boundary Review Background Paper ([SET9](#)) explains the principles for the inclusion of land within the settlement boundary, and this includes sites proposed for allocation. Boundaries will however exclude tree belts, woodland areas, and features which help to soften, screen existing development, and form a boundary to the settlement.

1.60. The site is adjacent to an area designated as the West Berkshire Living Landscape. It is expected that the open space / biodiversity buffer will make a positive contribution to the Living Landscape project area. It is therefore justified that only the developable area of the site is included within the settlement boundary. The proposed settlement boundary follows the developable area of the permitted development.

RSA5 Lower Way, Thatcham (85 dwellings)

Q6.10. Is there clear evidence to indicate that 85 dwellings will not be built on allocation RSA5 by 2026/27?

1.61. No, there is not clear evidence to indicate that 85 dwellings will not be built on the site by 2026/27.

1.62. As at 31 March 2022, no planning application was permitted on site. However, there was a full planning application (18/00964/FULEXT) for 91 dwellings approved in January 2023. Development commenced in October 2023 and is currently under construction.

1.63. The landowner has an option agreement with a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site.

The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).

- 1.64. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 91 dwellings could be viably delivered by 2026/27. This is considered realistic.
- 1.65. Development commenced in October 2023, and a site visit undertaken in February 2024 confirms that groundworks are in progress. The site is being promoted on the developer's website (see Appendix D).

Q6.11. Are the development parameters in policy RSA5 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

- 1.66. Yes, the Council considers that with the modification proposed below, development parameters are justified and will be effective in achieving sustainable development.
- 1.67. Appendix 8a (pp. 18-21) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.68. The site is located within Thatcham. Thatcham is the main urban area of West Berkshire, within the Newbury and Thatcham spatial area. It is therefore a sustainable location which is, in principle, acceptable for further development.
- 1.69. Most of the development parameters included within policy RSA5 have been retained from policy HSA5 of the adopted HSA DPD ([SD2](#)). They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.70. The development potential of the scheme is based on the developable area of the site as informed by technical work and the standard density that was set out in the Council's SHLAA (which was prepared as part of the work on the HSA DPD).
- 1.71. Access to the site should come from Lower Way, the policy also requires the potential for two accesses to ensure permeability through the site. Provision of pedestrian and cycle linkages are required to increase the permeability of the site and further integrate into the neighbouring community.
- 1.72. A LVIA is required to conserve and enhance the important setting of Thatcham Lakes and should make a positive contribution to the adjacent West Berkshire Living Landscape Project.

- 1.73. The development also provides an opportunity to enable effective integration with the existing built form and the policy requires to retain the existing public rights of way within or adjacent to the site as distinct routes separate from the roads within the development.
- 1.74. The site is in close proximity to a SSSI, SAC and a Local Nature Reserve. The policy within the HSA DPD required an extended phase 1 habitat assessment to ensure any protected habitats and species are not adversely affected. This has now been changed to an appropriate EclA following representations by BBOWT to the Regulation 18 consultation on the emerging draft LPR.
- 1.75. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the RSA policies, proposes a minor modification to the policy as follows:
- ~~“g) Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site~~ the archaeological assessment already undertaken of the site.”
- 1.76. As a small part of the site is within an area at risk from surface water flooding, a Flood Risk Assessment (FRA) is required which will advise on appropriate mitigation measures.
- 1.77. As there is suspected contamination on land north of the Thatcham Discovery Centre, a phase 1 contamination assessment is required and subsequent investigations as necessary.
- 1.78. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- ~~“j) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.~~ Development will be occupied in line with this strategy.”
- 1.79. A Habitat Regulation Assessment (HRA) is required to safeguard the special ecological interest of the adjacent SSSI and SAC to the south of the site.
- 1.80. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.

- 1.81. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

6.2 Non strategic allocations: Eastern Area

RSA6 Stonehams Farm, Tilehurst (C2 care home)

Q6.12. Is there a reasonable prospect that allocation RSA6 will be available and a 64 bed care home could be viably developed during the plan period?

- 1.82. Yes, there is a reasonable prospect that the allocation will be available and a 64-bed care home could be viably developed during the plan period.
- 1.83. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.84. The site benefits from full planning permission (19/00344/COMIND) for a 64-bed care home. Development commenced in September 2022 and is currently under construction.
- 1.85. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.86. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and a 64 bed care home could be viably delivered within the plan period. This is considered realistic.
- 1.87. Stonehams Farm in Tilehurst is an allocation in the adopted HSA DPD ([SD2](#)). The submission version of the LPR ([CD1](#)) retained residential allocations from the current Local Plan which were either not built out or which were not nearing completion.
- 1.88. Development commenced in September 2022, and a site visit undertaken in February 2024 confirms that development is at an advanced stage of construction.
- 1.89. The Council therefore proposes a main modification to the LPR to remove policy RSA6. Subsequent main modifications are also proposed to policy SP12 and the housing trajectory to include the outstanding number of

dwellings within the supply category 'Local Plan allocations not being retained due to site being at an advanced stage of construction'.

Q6.13. Are the development parameters in policy RSA6 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

- 1.90. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The current planning permission is being implemented. The development parameters have been followed through the development management process to ensure the proposed development can achieve sustainable development.

RSA7 Purley Rise, Purley (35 dwellings)

Q6.14. Is there clear evidence to indicate that 35 dwellings will not be built on allocation RSA7 by 2024/25?

- 1.91. No, there is not clear evidence to indicate that 35 dwellings will not be built on the site by 2024/25.
- 1.92. The site benefits from both outline (18/00878/OUTMAJ) and reserved matters (21/00776/RESMAJ) planning permission for up to 29 dwellings. Development commenced in 2023 and is currently under construction.
- 1.93. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.94. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 29 dwellings could be viably delivered by 2024/25. This is considered realistic.
- 1.95. Purley Rise in Purley is an allocation in the adopted HSA DPD ([SD2](#)). The submission version of the LPR ([CD1](#)) retained residential allocations from the current Local Plan which were either not built out or which were not nearing completion.
- 1.96. Development commenced in 2023, and a site visit undertaken in February 2024 confirms that development is at an advanced stage of construction. The site is also being promoted on the developer's website (see Appendix E), and the show home is available for viewings.
- 1.97. The Council therefore proposes a main modification to the LPR to remove policy RSA7. Subsequent main modifications are also proposed to policy

SP12 and the housing trajectory to include the outstanding number of dwellings within the supply category 'Local Plan allocations not being retained due to site being at an advanced stage of construction'.

Q6.15. Are the development parameters in policy RSA7 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)?

- 1.98. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The current planning permission is being implemented. The development parameters have been followed through the development management process to ensure the proposed development can achieve sustainable development.

RSA8 Bath Road / Dorking Way, Calcot (35 dwellings)

Q6.16. Is there a reasonable prospect that allocation RSA8 will be available and at least 35 dwellings could be viably developed during the plan period?

- 1.99. Yes, there is a reasonable prospect that the allocation will be available and at least 35 dwellings could be viably developed during the plan period.
- 1.100. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.101. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.102. As at 31 March 2022, no planning application had been approved on the site. However, a hybrid planning application (23/00117/OUTMAJ) was submitted and validated in January 2023. The full planning application element seeks a 70-bed care home (which equates to 39 dwellings), whilst the outline element is for 7 residential dwellings. The application is currently pending determination, and an extension of time has been agreed to 22 March 2024. A Section 106 agreement is to be signed shortly.
- 1.103. The site promoter has confirmed that once permission has been granted, development would commence immediately (see Appendix F).
- 1.104. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement

([EXAM12](#)). It is located in a suitable location for the defined use, is available, and at least 35 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.17. Are the development parameters in policy RSA8 justified, and will they be effective in achieving sustainable development on the site?

- 1.105. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.106. Appendix 8a (pp. 30-33) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.107. The site is located within Calcot, which forms part of the Eastern Urban Area. Within the settlement hierarchy, the Eastern Urban Area lies in the top tier meaning it is an area that will be the focus for development. It is therefore a sustainable location which is, in principle acceptable for further development.
- 1.108. Most of the development parameters included within policy RSA8 have been retained from policy HSA13 of the adopted HSA DPD ([SD2](#)). They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.109. The development potential of the scheme is based on the developable area of the site as informed by technical work and the standard density that was set out in the Council's SHLAA, which was prepared as part of the work on the HSA DPD.
- 1.110. As a small part of the site is within an area at risk from surface water flooding, a FRA is required by the policy which will advise on appropriate mitigation measures.
- 1.111. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- “d) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”

- 1.112. The policy within the HSA DPD required an extended phase 1 habitat assessment due to an adjacent site being in environmental stewardship and rich in species. This has now been changed to an EclA following representations by BBOWT to the Regulation 18 consultation on the emerging draft LPR.
- 1.113. Due to the proximity of the site to the A4, a noise and air quality survey to advise on appropriate mitigation is required.
- 1.114. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.115. Due to the sites location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.
- 1.116. A Construction and Operations Management Plan is required to safeguard the a nearby oil pipeline from operational works.

RSA9 A340 / The Green, Theale (100 dwellings)

Q6.18. Is there a reasonable prospect that allocation RSA9 will be available and could be viably developed for 100 dwellings during the plan period?

- 1.117. Yes, there is a reasonable prospect that the allocation will be available and could be viably developed for 100 dwellings during the plan period.
- 1.118. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.119. The site benefits from an outline planning permission (19/01172/OUTMAJ) for up to 104 dwellings. As at 31 March 2022, no planning application for the reserved matters was permitted on site. However, a reserved matters planning application (23/00790/RESMAJ) for up to 104 dwellings was permitted in October 2023.
- 1.120. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.121. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available,

and 100 dwellings could be viably delivered within the plan period. This is considered realistic.

- 1.122. Development commenced in January 2024, and a site visit undertaken in February 2024 confirms that groundworks are in progress. The site is being promoted on the developer's website (see Appendix G).

Q6.19. Are the development parameters in policy RSA9 justified, and will they be effective in achieving sustainable development on the site?

- 1.123. Yes, the Council considers that with the modification proposed below the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.124. Appendix 8a (pp. 34-37) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.125. The site is located within Theale. Theale is a rural service centre which forms part of the wider Eastern spatial area. It is a sustainable location which is, in principle, acceptable for further development. The site is well related to the existing settlement and close to local services and facilities.
- 1.126. Most of the development parameters included within policy RSA9 have been retained from policy HSA14 of the adopted HSA DPD ([SD2](#)). They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.127. The development potential of the scheme is based on the developable area of the site as informed by technical work and the standard density that was set out in the Council's SHLAA (which was prepared as part of the work on the HSA DPD).
- 1.128. The policy for this site requires there to be an emphasis on family housing. This is due to the level of proposed flatted development in the extant South Lakeside development and the alternative North and South Lakeside proposal.
- 1.129. Access to the site should come from The Green, although the policy also requires that additional access to the site is considered taking into account the relationship of any access point to the committed scheme at South Lakeside.
- 1.130. Due to the proximity of the site to the A4 and the M4, noise and air quality surveys should be carried out to advise on these issues and any subsequent mitigation measures.
- 1.131. A FRA is required as the site is greater than 1ha and the technical evidence base shows that the site has two small areas of surface water flood risk and is

within a groundwater emergence zone. The FRA will need to set out what mitigation measures are required on the site.

- 1.132. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“e) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”

- 1.133. A Landscape Capacity Assessment (LCA) 2015 ([LAN5h](#)) was carried out due to the site being in the setting of the North Wessex Downs AONB. This work shows that the eastern part of the site would be suitable for development, with the western part of the site being retained as an open landscape buffer between the edge of the village and Englefield Park and the AONB. The recommendations of the LCA have been included within policy RSA8, which also requires a full detailed Landscape and Visual Impact Assessment (LVIA). The LCA concluded that there was a risk, given the approved scale of development at South Lakeside, of changing the landscape character of west Theale, its landscape setting and its relationship with the AONB. It is therefore important that the mass and scale of the approved scheme at South Lakeside is not continued into the site and that future development here is in keeping with the low density pattern along The Green.
- 1.134. A requirement for an EclA has been included to increase emphasis on the requirement of national policy and legislation to mitigate for effects on habitats.
- 1.135. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.136. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.
- 1.137. There is an oil pipeline which runs from across the north western corner of the site. A Construction and Operations Management Plan is required to safeguard the oil pipeline from operational works.
- 1.138. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a main and a minor modification to the policy as follows:

“I) The scheme will be informed by the archaeological assessment already undertaken of the site.

The scheme will conserve the listed milestone in the north east corner of the site and enhance its setting.”

RSA10 Whitehart Meadow, Theale (40 dwellings)

Q6.20. Is there a reasonable prospect that allocation RSA10 will be available and at least 40 dwellings could be viably developed during the plan period?

- 1.139. Yes, there is a reasonable prospect that the allocation will be available and at least 40 dwellings could be viably developed during the plan period.
- 1.140. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.141. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix H.
- 1.142. At the current time no planning application for residential use has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 40 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.21. Are the development parameters in policy RSA10 justified, and will they be effective in achieving sustainable development on the site?

- 1.143. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.
- 1.144. Appendix 8b (pp. 33-41) of the SA/SEA ([CD3j](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.145. The site is adjacent to the settlement of Theale, and is close to the existing amenities of the village, the employment area at Arlington Business Park, and

public transport nodes. Within the settlement hierarchy, Theale is identified as a Rural Service Centre. Rural Service Centres are larger rural settlements which offer development potential appropriate to the character and function of the settlement.

- 1.146. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the site area (1.9ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement has been used (30dph). However, the need to avoid any development on Flood Zone 2 and the need to minimise the impact on the landscape character reduces the potential developable area and capacity of the site. The Council therefore considers that, from information available to date, the site will have a development potential for approximately 40 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.147. A Landscape Sensitivity and Capacity Assessment (LSCA, [LAN7b](#)) was prepared in September 2021 for the site. The recommendations of the LSA have been included within policy RSA10, which also requires a full detailed Landscape and Visual Impact Assessment (LVIA). As highlighted in the LSA, development should not extend beyond the north-east of the High Voltage Power Lines, nor beyond the stream to the south. It is also important to limit the scale of development to two storeys in height and to create a positive green infrastructure links with the existing open space. The policy also requires additional layers of tree planting to screen views from the AONB.
- 1.148. Access to the site from the High Street has been informed by consultation with the Council's Highways and Transport team who advised that acceptable access could be obtained onto the very east end of the High Street.
- 1.149. Following representations by Mid & West Berks Local Access Forum to the Regulation 18 consultation on the emerging draft LPR, the policy requires main pedestrian and cycle connections for the sites and to be linked to existing routes including the Public Rights of Way network.
- 1.150. A Transport Assessment will be required with nearby junctions modelled to determine the highway impact and capacity. The capacity of the A4 near the M4 needs to be investigated further as part of the Transport Assessment.
- 1.151. To help encourage sustainable travel and to encourage the use of non-car transport modes, the policy requires the provision of a travel information pack.
- 1.152. The majority of the site lies within Flood Zone 1 whereby there is a low risk of fluvial flooding, however the northern most extent of the site lies within Flood Zone 2 whereby there is a medium risk of fluvial flooding. In line with paragraph 161 of the NPPF, the policy takes a sequential approach to the location of development on the site. Therefore, the policy stipulates that development must be avoided within the area of the site within Flood Zone 2.

The scheme must be informed by a FRA of the site. The FRA is also required because there is some surface water pooling on site and high ground water levels.

- 1.153. A Surface Water Drainage Strategy is required due to surface water pooling on site. Consideration will also need to be given to the provision of Sustainable Drainage Systems (SuDS) on the site, along with necessary mitigation measures to contribute to a reduction in flood risk downstream.
- 1.154. A Level 2 Strategic Flood Risk Assessment (SFRA) was prepared in September 2022 which includes a detailed assessment of the site ([WAT3c](#)). The recommendations for drainage control and impact mitigation have been included within policy RSA10, which prefers 'natural', vegetated SuDS such as green roofs, swales and ponds over 'hard engineered' and below-ground SuDS.
- 1.155. Following representations from the Environment Agency to the Regulation 18 consultation on the emerging draft LPR, the policy requires a minimum 10 metres wide undeveloped buffer zone on both sides of Sulham Brook.
- 1.156. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“I) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”
- 1.157. The Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. BBOWT has also advised to the Regulation 18 consultation that the site appears to support a varied habitat mosaic. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.158. An archaeological desk-based assessment, and potentially further site evaluation is required to determine the archaeological significance of the site.
- 1.159. The site is adjacent to the M4 and A4 and at risk of noise and vibration from the M4 and pylons. A noise and air quality survey is therefore required to advise on any mitigation measure required to ensure air quality and noise levels on the site are kept to an acceptable level.

- 1.160. There is the possibility of contamination due to the presence of the former sewage works to the north of the site. The policy requires a desk based assessment to identify any contamination and remediation measures.
- 1.161. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included the policy to ensure that development contributes to this aim.
- 1.162. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

RSA11 Former sewage treatment works, Theale (60 dwellings)

<p>Q6.22. Is there a reasonable prospect that allocation RSA11 will be available and at least 60 dwellings could be viably developed during the plan period?</p>

- 1.163. Yes, there is a reasonable prospect that the allocation will be available and at least 60 dwellings could be viably developed during the plan period.
- 1.164. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.165. The site is owned by a developer, who has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix I.
- 1.166. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 60 dwellings could be viably delivered within the plan period. This is considered realistic.

<p>Q6.23. Are the development parameters in policy RSA11 justified, and will they be effective in achieving sustainable development on the site?</p>

- 1.167. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.

- 1.168. Appendix 8b (pp. 42-49) of the SA/SEA ([CD3j](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.169. The site is adjacent to the settlement of Theale and is close to the existing amenities of the town, the employment area at Arlington Business Park, and public transport nodes. Within the settlement hierarchy, Theale is identified as a Rural Service Centre. Rural Service Centres are larger rural settlements which offer development potential appropriate to the character and function of the settlement.
- 1.170. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the site area (3.5ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement has been used (30dph). However, the need to avoid any development on Flood Zone 2 and the need to minimise the impact on the landscape character reduces the potential developable area and capacity of the site. The Council therefore considers that, from information available to date, the site will have a development potential for approximately 60 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.171. A LSA ([LAN7c](#)) was prepared in September 2021 for the site. The recommendations of the LSA have been included within policy RSA11, which also requires a full detailed LVIA. As highlighted in the LSA, the development should be limited to the western part of the site and should not extend beyond the north-east of the High Voltage Power Lines. It is also important to limit the scale of development to two storeys in height, to include a 15 metres buffer to Blossom Lane and the footpath (THEA/5/1), as well as to create a positive green infrastructure links with the existing open space. The policy also requires additional layers of tree planting to screen views from the AONB.
- 1.172. Access to the site from the Blossom Lane has been informed by consultation with the Council's Highways and Transport team who advised that improvements would be required to Blossom Lane to allow appropriate access to the site. There is concern regarding the impact on Blossom Lane and into Theale, including the capacity of the A4 near the M4. A Transport Assessment is therefore required to evaluate traffic impact on the local highway network.
- 1.173. Following representations by Mid & West Berks Local Access Forum to the Regulation 18 consultation on the emerging draft LPR, the policy requires main pedestrian and cycle connections for the sites and to be linked to existing routes including the Public Rights of Way network.
- 1.174. To help encourage sustainable travel and to encourage the use of non-car transport modes, policy requires the provision of a travel information pack.

- 1.175. The majority of the site lies within Flood Zone 1 whereby there is a low risk of fluvial flooding, however the south east corner of the site lies within Flood Zone 2 whereby there is a medium risk of fluvial flooding. In line with paragraph 161 of the NPPF, policy takes a sequential approach to the location of development of the site. Therefore, policy stipulates that development must be avoided within the area of the site within Flood Zone 2. The scheme must be informed by a FRA of the site. The FRA is also required because there is some surface water pooling on site and high ground water levels.
- 1.176. A Surface Water Drainage Strategy is required due to surface water pooling on site. Consideration will also need to be given to the provision of Sustainable Drainage Systems (SuDS) on the site, along with necessary mitigation measures to contribute to a reduction in flood risk downstream.
- 1.177. A Level 2 Strategic Flood Risk Assessment (SFRA) was prepared in September 2022 which includes detailed assessment of the site ([WAT3c](#)). The recommendations for the drainage control and impact mitigation have been included within policy RSA11, which prefers 'natural', vegetated SuDS such as green roofs, swales and ponds over 'hard engineered' and below-ground SuDS.
- 1.178. Following representations by Environment Agency to the Regulation 18 consultation on the emerging draft LPR, the policy requires a minimum 10 metres wide undeveloped buffer zone on both sides of the Sulham Brook.
- 1.179. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- “1) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”
- 1.180. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. BBOWT has also advised to the Regulation 18 consultation that the site appears to support a varied habitat mosaic. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.181. There are no known archaeological issues on the site at present, but the Council's archaeologist has advised that potentially further investigation would be required as part of a planning application.

- 1.182. The site adjacent to the M4 and A4 and at risk of noise and vibration from M4 and pylons. A noise and air quality survey are required to advise on any mitigation measure required to ensure air quality and noise levels on the site are kept to an acceptable level.
- 1.183. There is possibility of contamination due to the presence of the former sewage works to the north of the site. The policy requires a desk based assessment to identify any contamination and remediation measures.
- 1.184. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.185. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

RSA12 Pondhouse Farm, Burghfield Common (100 dwellings)

Q6.24. Is there clear evidence to indicate that 100 dwellings will not be built on allocation RSA12 by 2024/25?
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- 1.186. No, there is not clear evidence to indicate that 100 dwellings will not be built on the site by 2024/25. However, based on the information provided by the developer, it is anticipated that the site will be built out by 2025/26.
- 1.187. The site benefits from both outline (18/02485/OUTMAJ) and reserved matters (22/00325/RESMAJ) planning permission for 100 dwellings. Development has commenced in 2023.
- 1.188. The site is owned by a developer who has confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.189. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 100 dwellings could be viably delivered by 2025/26. This is considered realistic.
- 1.190. Pondhouse Farm in Burghfield Common is an allocation in the adopted HSA DPD ([SD2](#)). The submission version of the LPR ([CD1](#)) retained residential allocations from the current Local Plan which were either not built out or which were not nearing completion.

- 1.191. A site visit undertaken in February 2024 confirms that development is at an advanced stage of construction. The site is also being promoted on the developer's website (see Appendix J).
- 1.192. The Council therefore proposes a main modification to the LPR to remove policy RSA12. Subsequent main modifications are also proposed to policy SP12 and the housing trajectory to include the outstanding number of dwellings within the supply category 'Local Plan allocations not being retained due to site being at an advanced stage of construction'.

Q6.25. Are the development parameters in policy RSA12 justified, and will they be effective in achieving sustainable development on the site (if the current planning permission is not implemented)? In particular, if the extant planning permission were not to be implemented, should the site remain undeveloped due to it being within the Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield?

- 1.193. Yes, the Council considers the development parameters are justified and will be effective in achieving sustainable development. The current planning permission is being implemented. The development parameters have been followed through the development management process to ensure the proposed development can achieve sustainable development.

RSA13 Bath Road, Woolhampton (16 dwellings)

Q6.26. Is there a reasonable prospect that allocation RSA13 will be available and at least 16 dwellings could be viably developed during the plan period?

- 1.194. Yes, there is a reasonable prospect that the allocation will be available and at least 16 dwellings could be viably developed during the plan period.
- 1.195. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.196. As at 31 March 2022, no planning application had been approved on the site. However, an outline planning application (23/00736/OUTMAJ) for 16 dwellings was submitted and validated in March 2023. The application is pending determination, and an extension of time has been agreed to 31 March 2024.
- 1.197. The site is in a single ownership and there is an option agreement with a developer. The landowner has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise

prevent development and delivery of the site. The site deliverability form is included in Appendix K.

- 1.198. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 16 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.27. Are the development parameters in policy RSA13 justified, and will they be effective in achieving sustainable development on the site?
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- 1.199. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.
- 1.200. Appendix 8b (pp. 50-56) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.201. Woolhampton is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.202. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the site area (0.8ha), to this the developable area percentage (80%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement has been used (30dph). However, the need to provide an appropriate buffer to ancient woodland reduces the potential developable area and capacity of the site. The Council therefore considers that, from information available to date, the site will have a development potential for approximately 16 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.203. Access to the site from A4 Bath Road has been informed by consultation with the Council's Highways and Transport team who advised that acceptable access could be obtained from A4 Bath Road. Pedestrian and cycle connections are required.
- 1.204. A Landscape and Visual Impact Assessment (LVIA) is required to conserve and enhance the rural setting of Woolhampton village.

- 1.205. Thames Valley Environmental Records Centre has advised that the development will have high risk of adverse nature conservation impact. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.206. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- “f) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”
- 1.207. To help encourage sustainable travel and to encourage the use of non-car transport modes, the policy requires the provision of a travel information pack.
- 1.208. The site lies immediately adjacent to a block of ancient woodland. An appropriate buffer of at least 15 metres between any development will be required.
- 1.209. There are no known archaeological issues on the site at present but the Council’s archaeologist has advised that further investigation will be required as part of a planning application. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the RSA policies, proposes a minor modification to the policy as follows:
- “i) ~~A desk based assessment to better understand archaeological potential and survival will be required. Subject to the results of the assessment, a field evaluation may be required.~~ Development should be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.”
- 1.210. Due to the site’s proximity to the Woolhampton Waste Water Treatment Works, an odour assessment will be required as part of a planning application.
- 1.211. Part of the site is underlain by aggregate mineral deposits. The Council’s Minerals and Waste Team has advised that a Minerals Resource Assessment will be required as part of a planning application.
- 1.212. A Construction and Operations Management Plan is required to safeguard the a nearby oil pipeline from operational works.

- 1.213. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. For consistency across the RSA policies, proposes a main modification to the policy as follows:

“m) The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5.”

6.3 Non strategic allocations: North Wessex Downs AONB

RSA14 Lynch Lane, Lambourn (60 dwellings)

Q6.28. Is there a reasonable prospect that allocation RSA14 will be available and at least 60 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.214. Yes, there is a reasonable prospect that the allocation will be available and at approximately 60 dwellings could be viably developed during the plan period.
- 1.215. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.216. As at 31 March 2022, no planning application had been approved on the site. However the site owner has engaged in pre-application discussions with the Council. Through the pre-application discussions, it has been identified that further design work is required before the application can be submitted. Details of this are set out within the site deliverability form included within Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.217. The site is owned by a developer who has confirmed that there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.218. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location

for the defined use, is available, and at least 60 dwellings could be viably delivered within the plan period. This is considered realistic.

- 1.219. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.220. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the East Shefford WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 90% by 1 January 2025.
- 1.221. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.
- 1.222. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

<p>Q6.29. Are the development parameters in policy RSA14 justified, and will they be effective in achieving sustainable development on the site?</p>

- 1.223. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.224. Appendix 8a (pp. 42-45) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.225. The site is located within Lambourn. As a Rural Service Centre, Lambourn is, in principle acceptable for further development, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.

- 1.226. Most of the development parameters included within policy RSA14 have been retained from policy HSA19 of the adopted HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.227. The Council's paramount consideration for the site is that development does not cause harm to the natural beauty and special qualities of the North Wessex Downs AONB and the parameters of the policy have been set accordingly. The policy is landscape led and therefore the development design, layout and capacity of the site will be expected to be in accordance with the LSA (2011) ([LAN3i](#)). It will also be further informed by a full and detailed LVIA. As highlighted in the LSA, it is important to limit the scale of development with a generous provision of green infrastructure, ensuring that new buildings are appropriately integrated into the landscape and to provide buffering to the adjacent wooded river corridor.
- 1.228. Development on the site must not adversely affect the adjacent SSSI/SAC and a Habitat Regulations Assessment will therefore be required at the planning application stage. Given the importance of the landscape and adjacent River Lambourn SSSI/SAC, a significant buffer will need to be provided between any development and the SSSI/SAC. From the information provided to date, the Council's ecologist has advised that this buffer will need to be a minimum of 38m, but this could be larger depending on detailed technical work which will need to be provided at a planning application stage.
- 1.229. The inclusion of a buffer on the site, the need to avoid any development on flood zones 2 and 3, as well as the need to minimise the impact on the landscape character reduces the potential developable area and capacity of the site. The Council therefore considers that, from information available to date, the site will have a development potential for approximately 60 dwellings. To calculate the indicative number of dwellings for sites, a standard density for the AONB has been used which is also set out in the SHLAA (20 dwellings per hectare). A density of 20dph was therefore applied to an area of 3.06ha. The actual number of dwellings achieved will however depend on the mix and detailed design at the planning application stage.
- 1.230. Taking the accommodation needs of the racehorse industry into account is considered an important part of the policy. This makes clear that the industry has a specific requirement for affordable single person accommodation.
- 1.231. The site is adjacent to the River Lambourn and as such the northern part of the site lies within Flood Zones 2 and 3. Initially the Environment Agency (EA) advised against development on the site but this advice was changed as part of its Preferred Options consultation response on the HSA DPD. The EA has now concluded that the site could be developed provided that there will be no development in Flood Zone 2 and 3. In accordance with this advice, the Council believes it will be important that development does not take place on that part of the site which is within Flood Zones 2 and 3. This includes essential infrastructure and water compatible development. An FRA would be

required to support any planning application on the site. The FRA would need to take into account all potential sources of flooding, including groundwater emergence and contamination. As part of the FRA consideration needs to be given to SUDS, along with the necessary mitigation measures to ensure the effective management of water flow and drainage.

1.232. Due to the site's location within the River Lambourn SAC Nutrient Neutrality Zone, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.

1.233. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“f) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy...”

1.234. The policy within the HSA DPD required an extended phase 1 habitat assessment. This has now been changed to an EclA following representations by BBOWT to the Regulation 18 consultation on the emerging draft LPR.

1.235. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included the policy to ensure that development contributes to this aim.

1.236. The development also provides an opportunity for improvements to be made to the Public Rights of Way network and so the policy requires the improvement of the pedestrian/bridle link between Lynch Lane and the village centre, and improved connectivity between Lower and Upper Lambourn.

1.237. There is the potential for this site to have high archaeological interest. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor modification to the policy as follows:

“k) Development should be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site. A pre-determination evaluation will be required.”

RSA15 Newbury Road, Lambourn (5 dwellings)

Q6.30. Is there a reasonable prospect that allocation RSA15 will be available and at least 5 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.238. Yes, there is a reasonable prospect that the allocation will be available and at least 5 dwellings will be viably developed during the plan period.
- 1.239. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.240. The site benefits from full planning permission (20/00972/FULMAJ) for 8 dwellings. A planning application for a smaller quantum of development for 5 dwellings (22/00277/FULMAJ) was submitted and validated in February 2022 and is currently pending termination.
- 1.241. The site is in a single ownership and there is an option agreement with a developer. The landowner has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.242. Based on the reduction in nutrient neutrality mitigation requirements after 2025/26 and the possibility of short-term mitigation solutions, it is estimated that 5 dwellings could be delivered by 2026/27. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and at least 5 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.243. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.244. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the East Shefford WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 90% by 1 January 2025.

- 1.245. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.
- 1.246. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.
- 1.247. The Council's Ecologist has advised that the landowner owns adjacent farmland that could possibly be used for mitigation for the proposed development. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

<p>Q6.31. Are the development parameters in policy RSA15 justified, and will they be effective in achieving sustainable development on the site?</p>

- 1.248. Yes, the Council considers that with the modification proposed below the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.249. Appendix 8a (pp. 46-49) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.250. The site is located within Lambourn. As a Rural Service Centre Lambourn is, in principle acceptable for further development, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.251. Most of the development parameters included within policy RSA15 have been retained from policy HSA20 of the adopted HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.252. A 2015 LCA ([LAN5e](#)) has indicated that the site could deliver a low density linear development along the road. The policy therefore states the provision of approximately 5 dwellings to be delivered at a low density in keeping with the surrounding area.

- 1.253. The development design and layout of the site is expected to be in accordance with the LCA (2015) and will also be further informed by a full and detailed LVIA.
- 1.254. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.255. Infiltration from groundwater into the network has been identified as a strategic issue within Lambourn by Thames Water and so an integrated Water Supply and Drainage Strategy would be particularly useful for this site. Such a strategy will also ensure that adequate and appropriate infrastructure for water supply and wastewater, both on and off site is provided. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this proposes a main modification to the policy as follows:
- “h) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy...”
- 1.256. It will be important that development on the site does not increase the risk of flooding elsewhere. The policy therefore includes a requirement for a FRA which takes account of all potential sources of flood risk, including groundwater emergence. As part of the FRA consideration will also need to be given to the provision of SuDS on the site, along with necessary mitigation measures such as the provision of petrol/oil receptors in order to protect the River Lambourn SSSI/SAC.
- 1.257. Due to the site’s location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.258. There are no known archaeological issues on the site at present but the Council’s archaeologist has advised that further investigation would be required as part of a planning application. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor modification to the policy as follows:
- “i) Development will be informed by an archaeological desk based assessment in the form of a geophysical survey followed by trial trenching if necessary as a minimum and field evaluation if required to assess the historic environment potential of the site. A pre-determination evaluation will be required.”
- 1.259. Although there are no known ecological issues on the site, following advice from Natural England about compensation measures for European sites as

part of the preparation of the HSA DPD, the policy requires an EclA. Appropriate avoidance and mitigation measures will need to be implemented to ensure any protected habitats and species are not adversely affected.

RSA16 Southend Road, Bradfield Southend (20 dwellings)

Q6.32. Is there a reasonable prospect that allocation RSA16 will be available and at least 20 dwellings could be viably developed during the plan period?

- 1.260. Yes, there is a reasonable prospect that the allocation will be available and at least 20 dwellings could be viably developed during the plan period.
- 1.261. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.262. The site is in a single ownership and there is an option agreement with a developer. The landowner has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix L.
- 1.263. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 20 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.33. Are the development parameters in policy RSA16 justified, and will they be effective in achieving sustainable development on the site?

- 1.264. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.
- 1.265. Appendix 8a (pp. 70-76) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.266. Bradfield Southend is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential,

either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.

- 1.267. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the site area (1.3ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement in AONB has been used (20dph). The Council therefore considers that, from information available to date, the site will have a development potential for approximately 20 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.268. Access to the site from Southend Road has been informed by consultation with the Council's Highways and Transport team who advised that an adoptable access is achievable immediately on to Southend Road. Pedestrian and cycle connections are required.
- 1.269. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:
- “b) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”
- 1.270. As a small part of the site is within an area at risk from surface water flooding, a Flood Risk Assessment is required which will advise on appropriate mitigation measures.
- 1.271. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.272. A 2014 LCA ([LAN4b](#)) indicated that development on site could deliver a low density development subject to the provision of a substantial tree belt along the northern boundary, linking to the existing tree belt to the north of the site, on the eastern boundary and with new planting on land at Stretton Close. However, development on land at Stretton Close to the east of the site was built out in 2023/24 with a revised layout. The Council therefore proposes a main modification to the policy as follows:

'f) Appropriate landscaping ~~A substantial tree belt~~ will be provided along the northern boundary, responding positively ~~linking~~ to the existing tree belt to the north of the site, on the eastern boundary and with new planting on land at Stretton Close.'

- 1.273. The development design and layout of the site is expected to be in accordance with the LCA (2014) and will also be further informed by a full and detailed Landscape and Visual Impact Assessment (LVIA).
- 1.274. Due to potential impact on significant tree belts and protected trees present on the eastern boundary of the site, an arboricultural survey will be required.
- 1.275. To help encourage sustainable travel and to encourage the use of non-car transport modes, the policy requires the provision of a travel information pack.
- 1.276. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.277. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.
- 1.278. A Statement of Common Ground is currently in preparation with the site promoter.

RSA17 Chieveley Glebe, Chieveley (15 dwellings)

Q6.34. Is there a reasonable prospect that allocation RSA17 will be available and at least 15 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.279. Yes, there is a reasonable prospect that the allocation will be available and at least 15 dwellings could be viably developed during the plan period.
- 1.280. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.281. The site is in a single ownership, who has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix M.

- 1.282. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 15 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.283. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.284. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the Chieveley WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 50% by 1 January 2025.
- 1.285. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.
- 1.286. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

Q6.35. Are the development parameters in policy RSA17 justified, and will they be effective in achieving sustainable development on the site? In particular, are main modifications required to:
(a) ensure the policy is effective with regard to the historic environment.
(b) propose a burial ground as part of the development.

- 1.287. Yes, the Council considers that with the modifications proposed below, the development parameters are justified and will be effective in achieving sustainable development.

- 1.288. Appendix 8a (pp. 84-91) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.289. Chieveley is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.290. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the site area (1.1ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement in AONB has been used (20dph). The Council therefore considers that, from information available to date, the site will have a development potential for approximately 15 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.291. A LSA ([LAN3c](#)) was prepared in September 2011 for the site. The recommendations of the LSA have been included within policy RSA17, which also requires a full detailed LVIA. As highlighted in the LSA, the development should be limited to the very small part of the wider promoted site as a continuation of the linear development along East Lane.
- 1.292. Access to the site from East Lane has been informed by consultation with the Council's Highways and Transport team who advised that an adoptable access is achievable on to East Lane. Appropriate sight lines of the accesses and pedestrian connections are required.
- 1.293. To help encourage sustainable travel and to encourage the use of non-car transport modes, the policy requires the provision of a travel information pack.
- 1.294. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.295. Due to the site's location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.296. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development.

- 1.297. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. The Council therefore proposes a main modification to the policy as follows:

“k) The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5.”

- 1.298. The Council is preparing a Statement of Common Ground with the Environment Agency and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.”

- 1.299. In order to ensure that the policy is effective with regard to the historic environment, the Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes main modifications to the policy as follows:

“ b) Access will need to be obtained from East Lane. To achieve the sight lines of 2.4 x 43 metres, accesses may need to serve more than one dwelling. The existing hedgerow fronting East Lane should be retained and enhanced as much as possible as part of the design.

g) The development design and layout will be further informed by a Heritage Impact Assessment. The development will protect and enhance the special architectural and historic interest of the Chieveley Conservation Area, with particular attention paid to the western end of the site adjoining the boundary of the Grade II listed the Old House.

j) Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.”

- 1.300. As the landowner has indicated that it would be willing to consider gifting some land to Chieveley Parish Council for use as a burial ground (location, access and size to be determined) as part of the allocation, the Council proposes a main modification to the policy as follows:

- 1.301. “l) Development of the site provides an opportunity to be able to establish a burial ground at the western end of the site adjoining the boundary of the Grade II listed the Old House. Further consideration will be required at the planning application stage in order to determine the detailed layout of this area.”

- 1.302. As the land to the rear of the allocated site is within the same ownership, there is also a potential opportunity to create footpath linkages to Chieveley

recreation ground and village hall from the western end of the site adjoining the boundary of the Grade II listed the Old House. The Council therefore proposes a main modification to the policy as follows:

“m) Development proposals should explore the opportunity to provide a footpath link to Chieveley recreation ground from the western part of the site adjoining the boundary of the Grade II listed the Old House.”

RSA18 Pirbright Institute, Compton (140 dwellings)

Q6.36. Is there a reasonable prospect that allocation RSA18 will be available and at least 140 dwellings could be viably developed during the plan period?

- 1.303. Yes, there is a reasonable prospect that the allocation will be available and at least 140 dwellings could be viably developed during the plan period.
- 1.304. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.305. The site has benefit of hybrid planning permission (20/01336/OUTMAJ) for up to 160 dwellings. The residential element of the proposal is outline planning permission.
- 1.306. The site is in a single ownership, who has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 3 of the Housing Background Paper ([HOU6](#)).
- 1.307. The landowner has confirmed that there is a reasonable prospect that development will be viably developed within the plan period. Demolition and remediation works are in progress, and work to secure a development partner (who will submit the reserved matters planning application) will commence in Summer 2024 (see Appendix N).
- 1.308. At the current time no reserved matters planning application has been approved. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and at least 140 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.37. Are the development parameters in policy RSA18 justified, and will they be effective in achieving sustainable development on the site?

- 1.309. Yes, the Council considers that with the modifications proposed below the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted Housing Site Allocations Development Plan Document HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.310. Appendix 8a (pp. 50-53) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.311. Most of the development parameters included within policy RSA18 have been retained from policy HSA22 of the adopted HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.312. Compton is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential. However, the Core Strategy Inspector's report identifies that the site could provide a higher level of growth than is normally expected in a service village, and paragraph 77 of the report notes that: *"There are also 2 large brownfield sites in Compton and Hermitage where substantial redevelopment for housing or mixed use might take place whilst achieving positive outcomes for the landscape. Accordingly, there is evidence to indicate that the scale of development could be delivered in a way likely to meet the aim of ADPP5."*
- 1.313. To this end, Compton will have a greater level of growth that would normally be expected in a Service Village in order to respond effectively to this brownfield opportunity. A Supplementary Planning Document (SPD) ([SIT6](#)) for the site has been prepared and adopted. This SPD sets out West Berkshire Council's planning guidance for the redevelopment of the site.
- 1.314. There are various constraints to development in Compton, not least its location within the North Wessex Downs AONB. There is a conservation area and many listed buildings, and parts of Compton lie within Flood Zones 2 and 3. There are issues of groundwater flooding and surface water flooding, and the village was badly affected in the February 2014 floods. Whilst Compton is located close to the A34 and M4, the local roads are rural in nature and not suitable for heavy traffic.
- 1.315. The Pirbright Site is previously developed land and is in a sustainable location which in principle is acceptable for further development.
- 1.316. The SPD identifies a developable area. The Council's paramount consideration for the site is that development does not cause harm to the natural beauty and special qualities of the AONB. The SPD does not suggest a housing number for the site, but does require, in development principle LU6,

that the overall density of the site should reflect the character of Compton. To calculate the indicative number of dwellings for sites, a standard density for the AONB was used when preparing the HSA DPD (20 dwellings per hectare). Therefore a density of 20dph was applied to an area of 7ha.

- 1.317. The SPD identifies that there is potential for a local lettings policy on the site (see paragraph 5.10), and development principle LU5 sets out that this should be explored. Development principle LU5 is reflected in the second criteria of the policy.
- 1.318. Adjacent to the western boundary of the site off Churn Road is a former hostel owned by the Institute, and it is recognised in the SPD that it could deliver additional development opportunities. A requirement has therefore been included within the policy should the hostel come forward for development in a timely manner with this site, for it to form an integrated element of the developable area.
- 1.319. As aforementioned, the SPD takes a landscape-led approach and in doing so, draws on Core Strategy policy CS4 (Housing Density and Mix) to highlight that some villages, like Compton, are particularly sensitive to the impact of intensification and redevelopment because of the prevailing character of the area, sensitive nature of the surrounding countryside/built form, and the relative remoteness from public transport. Development principle LU6 therefore identifies that the overall density of the site should reflect the character of Compton with Area B built to a lower density than Area C. LU6 is carried through as a requirement in policy RSA18.
- 1.320. The access requirements in the policy have arisen from development principle T3 of the SPD (which requires that the existing main access from the High Street to the site should be retained in order to ensure that the streetscape is maintained) and consultation with the Council's Highways and Transport team as part of work on the HSA DPD, identified that the existing access arrangement (main access from the High Street and further minor accesses from Churn Road) could apply for residential uses.
- 1.321. The requirement for improvements to the footways which front onto the site and the provision of additional cycle and pedestrian routes onto Hockham Road have been informed following liaison during preparation of the HSA DPD with the Council's Transport and Highways team.
- 1.322. Development principle GI4 of the SPD seeks footpath, bridleway and pedestrian links through the site and identifies the need to explore the opportunity for the reinstatement of the former east/west footpath through the site. This principle has been included as a policy requirement.
- 1.323. The previous uses on the site have given rise to contamination, and the NPPF is clear that where a site is affected by contamination, then it is the responsibility of the developer/landowner to secure a safe development. The SPD subsequently identifies the need for any planning application to be accompanied by a phase 1 contamination report and preliminary risk

assessment, and development principles C1 and C2 of the SPD go on to require that the site is remediated to the appropriate levels for the proposed land uses and that any remediation takes into account any plans or preferences for infiltration SuDS infrastructure in the proposed development. Such requirements have been incorporated into the policy.

- 1.324. An archaeological desk based assessment as a minimum and field evaluation if necessary are required as the SPD and HSA DPD evidence base shows that the site lies in the heart of a historic village with Medieval origins and that there is high archaeological potential. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor modification to the policy as follows:

~~'j) An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site~~ Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'

- 1.325. Part of the site falls within Flood Zones 2 and 3, a groundwater emergence zone and within an area at risk of surface water flooding. Development principles F1, F3, and F4 of the SPD, in addition to the planning application requirements identified in the SPD, a FRA will be required to cover infiltration testing, details of SuDs to be implemented and groundwater modelling whilst a sequential approach to development will be followed.

- 1.326. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

"l) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy."

- 1.327. The SPD identifies that the land to the north of the site, known as Area A, provides an opportunity to make a significant contribution to the landscape character and local distinctiveness of the AONB. The policy therefore identifies that Area A should be restored and enhanced with the landform carefully modified to remove incongruous features as informed by the 2012 Landscape Framework. The policy also makes clear that the development design and layout will include the protection of Area A.

- 1.328. Given the sensitive location of the site within the AONB, the development design and layout will need to be in accordance with the SPD and informed by

a full LVIA. The protection of the cricket ground as a community use as Green Infrastructure is also required as per development principle LC3 of the SPD.

- 1.329. The site abuts the Compton Conservation Area, therefore the policy requires that the scheme is designed to conserve and enhance the special architectural and historic importance of the conservation area and its setting. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor modification to the policy as follows:

“n) ...The scheme ~~It~~ will also conserve and enhance ~~explain how~~ the special architectural and historic interest of the Compton Conservation Area and protect its setting ~~has been taken into account...~~”

- 1.330. The Council is preparing a Statement of Common Ground with the Environment Agency and through this, proposes a main modification to the policy as follows:

“k ~~iii~~ detailed compute modelling of the River Pang which runs to the south of the site will be required to inform development proposals, including the latest Climate Change Allowances.”

- 1.331. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.

RSA19 Spring Meadows, Great Shefford (15 dwellings)

Q6.38. Is there a reasonable prospect that allocation RSA19 will be available and at least 15 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.332. Yes, there is a reasonable prospect that the allocation will be available and at least 15 dwellings could be viably developed during the plan period.

- 1.333. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.

- 1.334. The site is in a single ownership, and there is current interest from a developer. The landowner has also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix O.

- 1.335. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 15 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.336. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.337. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the East Shefford WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 90% by 1 January 2025.
- 1.338. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.
- 1.339. The Council's Ecologist has advised that provision of SuDS on the site and taking adjacent farmland out of agricultural use could possibly be used for mitigation for the proposed development. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

Q6.39. Are the development parameters in policy RSA19 justified, and will they be effective in achieving sustainable development on the site?
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- 1.340. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.

- 1.341. Appendix 8a (pp. 92-99) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.342. Great Shefford is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.343. The development potential of the site has been identified using the Council's density Pattern Book Study ([SIT3](#)). The starting point for the calculation of development potential was the whole site area (1.0ha), to this the developable area percentage (75%) has been applied and this was depending upon the size of the site and the proximity of the site to the built up area. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement in AONB has been used (20dph). The Council therefore considers that, from information available to date, the site will have a development potential for approximately 15 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.344. Access to the site from Spring Meadows has been informed by consultation with the Council's Highways and Transport team who advised that an adoptable access is achievable onto Spring Meadows. They have also advised that a footway will need to be provided from the development to the existing footway. Pedestrian and cycle connections are required. Main internal walking and cycle routes for the site should be linked to the existing routes.
- 1.345. A Landscape Sensitivity Assessment (LSA, [LAN3e](#)) was prepared in 2011 for the site. The LSA indicated that development on the site would not cause significant harm to the landscape character, and subject to a number of mitigation measures development would be acceptable and this view is supported by the AONB and Natural England. The recommendations of the LSA have been included within policy RSA19, which also requires a full detailed LVIA.
- 1.346. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. Therefore, the policy requires an EcIA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.347. The site is located within Flood Zone 1 whereby there is a low risk of fluvial flooding. However, there is a surface water flow path across the north east corner of the site, in addition to a small area of groundwater emergence in the north east corner of the site. In line with paragraph 161 of the NPPF, policy takes a sequential approach to the location of development of the site. Therefore, policy stipulates that development must be avoided within this north east corner of the site. In addition, the scheme must be informed by a Flood Risk Assessment (FRA) of the site.

- 1.348. Due to the site's location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.349. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development.
- 1.350. To help encourage sustainable travel and to encourage the use of non-car transport modes, policy requires the provision of a travel information pack.
- 1.351. There are no known archaeological issues on the site at present but the Council's archaeologist has advised that further investigation will be required as part of a planning application. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the RSA policies, proposes a minor modification to the policy as follows:
- ~~"k) A desk based assessment to better understand archaeological potential and survival will be required. Fieldwork techniques to better understand the Mesolithic potential may be necessary. Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site."~~
- 1.352. Part of the site is underlain by aggregate mineral deposits. The Council's Minerals and Waste Team has advised that a Minerals Resource Assessment will be required as part of a planning application.
- 1.353. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. For consistency across the RSA policies the Council therefore proposes a main modification to the policy as follows:
- "m) The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5."

RSA20 Charlotte Close, Hermitage (15 dwellings)

Q6.40. Is there compelling evidence that 15 dwellings on allocation RSA20 will not be built by 2026/27? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.354. No, there is no compelling evidence that the site will not be built by 2026/27. However, as outlined below the Council is taking a prudent approach to the delivery of the site and anticipates the site will be built out by 2028/29.

- 1.355. The site benefits from full planning permission for 16 dwellings (20/00912/FULEXT).
- 1.356. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.357. The site is owned by a developer who has confirmed in a site deliverability form that there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.358. Due to the site being located within the River Lambourn SAC catchment area, the Council considers it prudent to take a more cautious approach to when development will be built out. It is anticipated that the site will be built out by 2028/29.
- 1.359. The site is considered deliverable in accordance with the timescale set out in Appendix 2 Housing Trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and 16 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.360. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.361. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the Chieveley WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 50% by 1 January 2025.
- 1.362. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council

intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.

- 1.363. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

Q6.41. Are the development parameters in policy RSA20 justified, and will they be effective in achieving sustainable development on the site?
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- 1.364. Yes, the Council considers that with the modification proposed below the development parameters are justified and will be effective in achieving sustainable development. The Inspector has examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.365. Appendix 8a (pp. 54-57) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.366. Most of the development parameters included within policy RSA20 have been retained from policy HSA24 of the adopted HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.367. Hermitage is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential.
- 1.368. The paramount consideration for the site is that development does not cause harm to the natural beauty and special qualities of the AONB and the parameters have been set accordingly. The developable area of the site has been informed by the recommendations of the 2011 LSA ([LAN3f](#)).
- 1.369. To calculate the indicative number of dwellings for sites, a standard density for the AONB was used when preparing the HSA DPD (20 dwellings per hectare).
- 1.370. Access to the site from Station Road has been informed by consultation with the Council's Highways and Transport team who advised that acceptable access could be obtained onto Station Road. Pedestrian and cycle connections are required with the adjoining allocations.
- 1.371. An FRA is included as a requirement in the policy because a small area of the site as being susceptible to surface water flooding in addition to a small part of the site being within a Critical Drainage Area. The FRA will advise on any necessary mitigation measures and SuDS techniques.

- 1.372. Thames Water has identified that an ordinary watercourse in culvert is located beneath the site, and development should therefore include opportunities to open up the culvert and contribute to biodiversity net gain.
- 1.373. There is potential for Great Crested Newts in a nearby pond, therefore the policy requires a Great Crested Newt Study, and an EcIA.
- 1.374. Due to the site's location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.375. To ensure that adequate and appropriate infrastructure for water supply and wastewater, both on and off site, an integrated water supply and drainage strategy must be provided in advance of development.
- 1.376. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.377. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor modification to the policy as follows:
- “j) The development will be informed by ~~a desk-based archaeological assessment followed by field evaluation if necessary~~ the archaeological assessment already undertaken of the site.”
- 1.378. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

RSA21 Old Farmhouse, Hermitage (10 dwellings)

Q6.42. Is there a reasonable prospect that allocation RSA21 will be available and at least 10 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.379. Yes, there is a reasonable prospect that the allocation will be available and at least 10 dwellings could be viably developed during the plan period.
- 1.380. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type).

This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.

- 1.381. The site benefits from outline planning permission for up to 21 dwellings with additional land (inside the settlement boundary) adjacent to the allocated site (17/03290/OUTMAJ). A reserved matters application (21/02923/RESMAJ) was submitted and validated in December 2021 and is currently pending determination.
- 1.382. The site is owned by a developer who has confirmed that there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix 2 of the Housing Land Supply Statement ([EXAM12](#)).
- 1.383. Due to the nutrient neutrality mitigation required, it is estimated that the development will commence outside of the five year period. The site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)) and the latest published position within the Housing Land Supply Statement ([EXAM12](#)). It is located in a suitable location for the defined use, is available, and up to 21 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.384. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.385. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the Chieveley WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 50% by 1 January 2025.
- 1.386. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.

- 1.387. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

Q6.43. Are the development parameters in policy RSA21 justified, and will they be effective in achieving sustainable development on the site?

- 1.388. Yes, the Council considers that with the modification proposed below the development parameters are justified and will be effective in achieving sustainable development. The Inspector who examined the adopted HSA DPD ([SD2](#)) was satisfied that the allocation of the site was justified with modifications.
- 1.389. Appendix 8a (pp. 54-57) of the SA/SEA ([CD3i](#)) confirms that the policy will overall have a positive impact on sustainability, and does not highlight any significant sustainability effects.
- 1.390. Most of the development parameters included within policy RSA21 have been retained from policy HSA25 of the adopted HSA DPD. They are based on the outcomes of the site selection work and SA/SEA undertaken as part of work on the HSA DPD.
- 1.391. Hermitage is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential.
- 1.392. The paramount consideration for the site is that development does not cause harm to the natural beauty and special qualities of the AONB and the parameters have been set accordingly. The developable area of the site has been informed by the recommendations of the 2011 Landscape Sensitivity Assessment (LSA) ([LAN3f](#)).
- 1.393. To calculate the indicative number of dwellings for sites, a standard density for the AONB was used when preparing the HSA DPD (20 dwellings per hectare).
- 1.394. The identification of accesses within the policy has been informed following consultation with the Council's Highways and Transport team as part of work on the HSA DPD.
- 1.395. A FRA is included as a requirement in the policy because a small area of the site as being susceptible to surface water flooding in addition to a large part of the site being within a Critical Drainage Area. The FRA will advise on any necessary SuDS techniques and mitigation measures.
- 1.396. There is potential for Great Crested Newts in a nearby pond, therefore the policy requires a Great Crested Newt Study, and a EclA.

- 1.397. Due to the site's location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.398. Thames Water has identified that an ordinary watercourse in culvert is located beneath the site, and development should therefore include opportunities to open up the culvert and contribute to biodiversity net gain.
- 1.399. To ensure that adequate and appropriate infrastructure for water supply and wastewater, both on and off site, an integrated water supply and drainage strategy must be provided in advance of development.
- 1.400. An archaeological desk based assessment is necessary as the evidence base shows that the site has a surviving ridge and furrow which are a rare feature in West Berkshire, and a historic farmstead and railway features. The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a minor and a main modification to the policy as follows:
- ~~“j) An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site. Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.”~~
- l) The design of the development should protect the setting of the nearby Listed Building (Barnaby Thatch)”
- 1.401. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.402. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.

RSA22 Station Road, Hermitage (34 dwellings)

Q6.44. Is there a reasonable prospect that allocation RSA22 will be available and at least 34 dwellings could be viably developed during the plan period? In particular, what type of mitigation is likely to be required to achieve nutrient neutrality, and when would that mitigation be likely to be in place and operational?

- 1.403. Yes, there is a reasonable prospect that the allocation will be available and at least 34 dwellings could be viably developed during the plan period.
- 1.404. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been

addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.

- 1.405. The joint owners have been approached by several developers who have expressed an interest in acquiring and developing the site. The joint owners confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix P.
- 1.406. At the current time no planning application has been approved on the site. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 34 dwellings could be viably delivered within the plan period. This is considered realistic.
- 1.407. In terms of nutrient neutrality, the Levelling-up and Regeneration Act 2023 places a new statutory duty on water and sewerage companies in England to upgrade WwTWs to the highest technically achievable limits by 2030 in nutrient neutrality areas. It is therefore anticipated that nutrient issues will be largely resolved by the end of 2030.
- 1.408. All WwTWs that treat effluent and discharge into the River Lambourn SAC catchment area will have technical upgrades made to phosphorous recovery facilities by 1 January 2025, such that they remove much more phosphorous and thus reduce the requirement for mitigation for new homes connecting to those WwTWs. Development on this site will connect to the Chieveley WwTW, and it is anticipated that the phosphorous mitigation requirements will be reduced by 50% by 1 January 2025.
- 1.409. To determine the outstanding mitigation required to achieve nutrient neutrality, the Council has appointed consultants to provide advice and guidance on short, medium and longer term mitigation solutions. This will provide the basis for the Council to produce a Nutrient Mitigation Strategy for the River Lambourn SAC catchment. The Council expects to receive the final completed report in June 2024. Consultants also produced a revised nutrient budget calculator which has been agreed with Natural England. The Council intends to adopt the revised calculator in May 2024. The revised calculator will result in reduced nutrient mitigation requirements for residential development in the River Lambourn SAC catchment area, therefore, making it more feasible to deliver.
- 1.410. The outstanding mitigation measures will be decided using the guidance and strategy through the development management process to ensure the proposed development can achieve nutrient neutrality.

Q6.45. Are the development parameters in policy RSA22 justified, and will they be effective in achieving sustainable development on the site? In particular, is a main modification required to ensure the policy is effective with regard to the historic environment?

- 1.411. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.
- 1.412. Appendix 8a (pp. 124-131) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.413. Hermitage is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.414. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of the development potential was the site area excluding the open area to the north of the site (2.3ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement in AONB has been used (20dph). The Council therefore considers that, from information available to date, the site will have a development potential for approximately 34 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.
- 1.415. Access to the site from Station Road has been informed by consultation with the Council's Highways and Transport team who advised that an adoptable access is achievable onto Station Road. Pedestrian and cycle connections to Hermitage Green, the allocations RSA20 Charlotte Close, Hermitage and RSA21 Old Farmhouse, Hermitage are required. Due to concerns about impact on local highway capacity, a Transport Assessment is required at the planning application stage.
- 1.416. A Landscape Sensitivity and Capacity Assessment (LSA, [LAN8bb](#)) was prepared in May 2022 for the site. The recommendations of the LSA have been included within policy RSA22, which also requires a full detailed Landscape and Visual Impact Assessment (LVIA). As highlighted in the LSA, development should retain the land to the north of the site as an open area which could have a character of a village green.
- 1.417. To correct typos in the policy, the Council proposes a minor modification to the policy as follows:
- d) ... ii) Retain the ~~the~~ land in to the north of the site as an open area which could have a character of a village green;

- 1.418. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.419. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.420. Due to the site's location within the hydrological catchment of the River Lambourn SSSI/SAC, a Habitats Regulations Assessment will be required, in addition to an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.
- 1.421. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development.
- 1.422. As a small part of the site is within an area at risk from surface water flooding, a Flood Risk Assessment is required which will advise on appropriate mitigation measures.
- 1.423. To ensure the policy is effective with regard to the historic environment, the Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and proposes a main and a minor modification to the policy as follows:
- “k) A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle).
- l) Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.
- 1.424. Part of the site is underlain by aggregate mineral deposits. The Council's Minerals and Waste Team has advised that a Minerals Resource Assessment will be required as part of a planning application. The Council therefore proposes a main modification to the policy as follows:
- “l) Part of the site is underlain by aggregate mineral deposits and a Minerals Resource Assessment will be required”

RSA23 The Haven, Kintbury (20 dwellings)

Q6.46. Is there a reasonable prospect that allocation RSA23 will be available and at least 20 dwellings could be viably developed during the plan period?

- 1.425. Yes, there is a reasonable prospect that the allocation will be available and at least 20 dwellings could be viably developed during the plan period.
- 1.426. A Viability Assessment ([VIA1a](#)) has been undertaken for the LPR to support both policies and site allocations. Potential site allocations have been addressed using a proportionate test of a range of appropriate residential typologies (eg. previously developed land / greenfield, site size, housing type). This site aligns with the typology used in the assessment, and Appendix II ([VIA1c](#)) illustrates the viability of sites of this nature.
- 1.427. The site is in multiple ownerships although there is an option agreement with a developer. The landowners have also confirmed there are no known legal, cost, ownership fragmentation or other delivery issues which would otherwise prevent development and delivery of the site. The site deliverability form is included in Appendix Q.
- 1.428. At the current time no planning application has been permitted. As such, the site is not currently considered deliverable within the five year period. However, the site is considered deliverable in accordance with the timescale set out in Appendix 2 housing trajectory of the Housing Background Paper ([HOU6](#)). It is located in a suitable location for the defined use, is available, and at least 20 dwellings could be viably delivered within the plan period. This is considered realistic.

Q6.47. Are the development parameters in policy RSA23 justified, and will they be effective in achieving sustainable development on the site?

- 1.429. Yes, the Council considers that with the modification proposed below, the development parameters are justified and will be effective in achieving sustainable development.
- 1.430. Appendix 8a (pp. 116-123) of the SA/SEA ([CD3i](#)) confirms that the policy will have an overall neutral impact on sustainability, and does not highlight any significant sustainability effects.
- 1.431. Kintbury is identified as a Service Village within the district settlement hierarchy meaning that, along with the other Service Villages, it has a limited range of services and has some limited development potential, either within the existing settlement boundary or through appropriate allocations adjacent to it, made via the plan-led-process.
- 1.432. The development potential of the site has been identified using the Council's Density Pattern Book Study ([SIT3](#)). The starting point for the calculation of the development potential was the site area (1.4ha), to this the developable area percentage (75%) has been applied. To calculate the indicative number of dwellings for sites, a standard density for the edge of village / settlement in AONB has been used (20dph). The Council therefore considers that, from information available to date, the site will have a development potential for

approximately 20 dwellings. The actual number of dwellings achieved will depend on the mix and detailed design at the planning application stage.

- 1.433. A Landscape Sensitivity Assessment ([LAN3h](#)) was prepared in 2011 for the site. The recommendations of the LSA have been included within policy RSA23, which also requires a full detailed LVIA.
- 1.434. Thames Valley Environmental Records Centre has advised that the development will have medium risk of adverse nature conservation impact. There is potential for Great Crested Newts. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- 1.435. One of the strategic objectives of the LPR is to mitigate and adapt to the effects of climate change. A criterion has been included in the policy to ensure that development contributes to this aim.
- 1.436. To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“f) An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and wastewater, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.”
- 1.437. Access to the site from the Haven has been informed by consultation with the Council's Highways and Transport team who advised that an adoptable access is achievable onto the Haven via the existing garages. Pedestrian and cycle are required. Due to concerns about impact on local highway capacity, a Transport Assessment is required at the planning application stage.
- 1.438. Due to the site's location within a Mineral Safeguarding Area, consideration needs to be made to policy 9 of the adopted West Berkshire Minerals and Waste Local Plan.
- 1.439. Due to the site's proximity to a sports ground, a noise survey is required to advise on any mitigation measure required to ensure noise levels on the site are kept to an acceptable level.
- 1.440. The Council is preparing a Statement of Common Ground with the Environment Agency and through this, to ensure consistency across all the RSA policies, proposes a main modification to the policy as follows:

“The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.”

MEMORANDUM

To:	Masie Masiwa and Simon Till	Our Ref:	*
From:	Phil Lomax (Ecologist)	Your Ref:	22/01235/RESMAJ, 23/00373/RESMAJ, 23/00397/OUTMAJ
Extn:	*	Date:	9 th November 2023

Further Ecological Advice – Residential developments at Bath Road, Speen (applications 22/01235/RESMAJ, 23/00373/RESMAJ, 23/00397/OUTMAJ Section 73)

The advice below is further to the previous advice on the above applications that I sent to you between the 25th and 27^h September 2023. It replaces that previous advice in respect of the nutrient impacts of the submitted plans. It is based on the relevant plans and documents submitted in connection with the above applications since September 2023.

Nutrient Impacts

I have previously advised you of my concerns that whilst the applicants have stated that this proposed new residential development is to be connected to the Newbury WwTw for the purposes of treating sewage, we have never had any confirmation from Thames Water that such a connection is feasible and that the Newbury WwTW has the capacity to treat the additional foul wastewater. I therefore advised you again, that without official confirmation that such a connection is feasible from Thames Water we cannot determine the current application because to do so could result in approving development that results in adverse effects on the River Lambourn SAC contrary to Regulation 63 of the Conservation of Habitats and Species Regulations, 2017 (as amended).

Since providing that advice, I have had the opportunity to meet with the applicants David Wilson Homes (DWH) who have informed me of the steps they are taking to obtain the confirmation we require from Thames Water regarding connectivity and capacity. Further to this meeting, we have now been provided with copies of correspondence received by DHW from Thames Water. This correspondence consists of:

1. A letter dated 10th October 2023 (copy at Appendix 1) from Thames Water confirming that the foul sewers in Bath Road and Station Road to which the above residential developments will connect, are connected to the Newbury WwTW;
2. A letter dated 6th November 2023 (copy at Appendix 2) from Thames Water confirming that the Newbury WwTW has the capacity to treat all the foul wastewater from the above residential developments.

Based on this confirmation of connectivity to and capacity at the Newbury WwTW, I now advise you that there will be no likely significant effects on the River Lambourn SAC from the treatment and discharge of foul wastewater.

Furthermore, as the above residential developments were approved by the local planning authority without the requirement for an Environmental Impact Assessment (EIA), then

based on the previous advice we have received from Natural England, the changes in nutrient export levels resulting from the changes in land use and land management can be disregarded and it is not considered that these will be significant even though the application sites are located within the Lambourn catchment. And in any case, a revised nutrient budget calculation submitted by the applicants consultants, indicated that the post-development land use would be nutrient neutral¹.

Therefore, it is now my advice, that taking all of the above information and evidence into consideration, the above planning applications, neither individually nor in combination with each other or with other projects, are likely to result in significant effects on the River Lambourn SAC and therefore do not require further Appropriate Assessment under Regulation 63 of the Habitats Regulations.

Other Ecological Impacts

I will provide you with advice on the other ecological effects of the above applications separately in due course.

If you have any queries, please don't hesitate to contact me.

¹ Bath Road, Speen Reserved Matters Application for 93 Units - Nutrient Budget. 1st February 2023. Ecological Planning and Research Ltd.

Appendix 9 – Site Deliverability Forms November 2022

Appendix 2

5 Year Housing Land Supply Site Deliverability Forms

Core Strategy Development Plan Document Strategic Site Allocations

Newbury Racecourse Strategic Site Allocation

Part 2: Information on site deliverability

1. Site details		
Site address	Land south of Monks Lane, west of A339	
Number of residential units proposed	Net additional units	1080
	Gross (total) units	1080

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes Ref: 20/01238/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – works are ongoing to prepare Discharge of Condition applications for all the prior to submission of reserved matters conditions.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No – but under option (see below)
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – site to be developed by Bloor Homes Limited
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Bloor Homes Limited
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes – Bloor Homes Limited has an option agreement in place

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>No physical development has yet taken place.</p> <p>Start on site anticipated in April 2024.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	0
	2023/24	0
	2024/25	50
	2025/26	120
	2026/27	120
	2027/28	120
	2028/29	120
	2029/30	120
	2030/31	120
	2031/32	120
	2032/33	120
	2033/34	70
	2034/35	0
	2035/36	0
	2036/37	0
	2037/38	0
	2038/39	0
Post 2039		0

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

Planning and Technical approvals process are the key constraints on development moving forward promptly.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

Bloor Homes is committed to working with WBC to bring this site forward in a timely manner. Demand remains strong in the area.

10. Additional comments

Completed by: Robert White
Position: Director
Organisation: White Peak Planning Limited
Date: 29th September 2022

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Rebecca Humble			
Organisation (if relevant)	Pegasus Group (Planning)			
Representing (if applicable)	Donnington New Homes			
Address	[REDACTED]			
Telephone	[REDACTED]			
Email	[REDACTED]			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input type="checkbox"/>
	Other (please specify)			

2. Ownership details					
Are you the current owner of the site?	No				
If YES, are you...	<table border="1"> <tr> <td>Sole owner</td> <td><input type="checkbox"/></td> <td>Part owner</td> <td><input type="checkbox"/></td> </tr> </table>	Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>
Sole owner	<input type="checkbox"/>	Part owner	<input type="checkbox"/>		
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.	[REDACTED] [REDACTED] [REDACTED]				
Has the landowner (or each owner) indicated support for development of the land?	Yes				

Part 2: Information on site deliverability

1. Site details		
Site address	Sandleford Park West, Warren Road, Newbury, RG14 6NH	
Number of residential units proposed	Net additional units	Up to 500
	Gross (total) units	Up to 500
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	An Outline application, reference 18/00828/OUTMAJ, was submitted to West Berkshire Council in 2018 however, to date, has not been approved.

Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Application/s for Reserved Matters approval would follow Outline approval.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Outline permission has been sought.
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability (please give details)

Is the landowner still supportive of the development of the site?	The landowners are wholly supportive of the development of Sandleford Park West
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	No
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Donnington New Homes which is owned by Mark Norgate
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)

In September, 2015, Bloor Homes submitted a planning application which covered the whole allocated site at Sandleford Park (including New Warren Farm) in outline, together with a detailed design of a first phase of the development in the northern part of the site adjoining Monks Lane. Bloor Homes' second application was submitted in early 2016 and was a fully detailed application for their first phase of development as a stand-alone proposal. Because Donnington New Homes were not party to either of those applications, the Council was not willing to approve them because they could not deliver the comprehensive development of the site. Both of those applications were refused in November 2017.

In December, 2016, Bloor Homes submitted a third planning application proposing up to 1,000 homes on the land under their control. Again, that application has been refused.

However, following the submission of Bloor Homes' third planning application, the Council contacted both Bloor Homes and Donnington New Homes separately and informed them that, whilst their preference remained for a single planning application, the Council may be willing to consider the delivery of the Sandleford Park development through two separate but linked planning applications if they could be convinced that the

comprehensive development of Sandleford Park could equally be delivered in that way. As a result, Bloor Homes and Donnington New Homes worked increasingly closely during 2017 and early 2018, and their commitment to working collaboratively was confirmed by the signed Memorandum of Understanding which accompanied applications submitted by both Donnington New Homes and Bloor Homes.

Discussions with the Council became drawn out and protracted with the Council citing need for a single application across the allocation as a key reason for its unwillingness to progress Donnington New Homes application, and also owing the changes in personnel within the Council. In 2020 Bloor submitted a further application which was refused. Bloor appealed that decision (and as a result the Council refused to progress the Donnington New Homes Outline application until Bloor Homes appeal was determined). In May 2022, the Secretary of State granted planning permission to develop part of the allocated site stating that the site did not need to be brought forwards through a single application. Donnington New Homes now intends to work towards achieving Outline planning permission taking into account the Secretary of State's decision.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	
	2024/25	Up to 120
	2025/26	Up to 120
	2026/27	Up to 120
	2027/28	Up to 120
	2028/29	Up to 20
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

The absence of a grant of planning permission by the Council is prohibitive to the development of the site.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

The site remains achievable, suitable and available for development.

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

See section 4 above.

10. Additional comments

Completed by: Rebecca Humble

Position: Associate

Organisation: Pegasus Group (Planning)

Date: 28.09.2022

Housing Site Allocations Development Plan Document Allocations
Stratfield Mortimer Neighbourhood Development Plan Allocation

HSA1

Land north of Newbury College, Monks Lane, Newbury

Part 1: Contact and ownership details

Personal information given on this form will be used for the purpose of correspondence only.

1. Your details				
Name	Cole Bates			
Organisation (if relevant)	Feltham Properties Ltd			
Representing (if applicable)	N/A			
Address	<div>██████████</div> <div>██████████</div> <div>██████</div> <div>██████</div> <div>██████</div>			
Telephone	██████████			
Email	██			
You are..? (Please tick all that apply)	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other (please specify)			

2. Ownership details				
Are you the current owner of the site?	Yes			
If YES, are you...	Sole owner	<input type="checkbox"/>	Yes	Part owner
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners.				
Has the landowner (or each owner) indicated support for development of the land?				

Part 2: Information on site deliverability

1. Site details		
Site address	Land North of Just Learning Nursery, Monks Lane, Newbury	
Number of residential units proposed	Net additional units	
	Gross (total) units	16

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes – 19/00669/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes – 20/00346/RESMAJ
	No. Please indicate what progress has been made on a full application	

	and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
No progress. Pre-app submission made (June 2022) incorporating additional land and increased number of dwellings.

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	

Post 2039

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

Planning delay on revised site / scheme.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

Housing market likely to cool off due to cost of living crisis and mortgage uncertainty.

10. Additional comments

Completed by: Cole Bates

Position: Development Analyst

Organisation: Feltham Properties Ltd

Date: 28-09-2022

HSA2

Land at Bath Road, Speen, Newbury

Agent contacted and no response received.

HSA3

Land at Coley Farm, Stoney Lane, Newbury

Agent contacted and no response received.

HSA4 (NEW047 B)
Land west of New Road, North of Pyle Hill, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the West of New Road, Greenham, Newbury	
Number of residential units proposed	Net additional units	36
	Gross (total) units	36

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	18/00529/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharged	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	Individual completed properties are for sale
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Build completion achieved on 25 units</p> <p>Remainder due to be completed within the next 3 months</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	36
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
N/A

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
N/A

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

-

10. Additional comments

-

Completed by: James Bull

Position: Director

Organisation: Rivar Ltd

Date: 12.9.2022

HSA4 (NEW047 D)

Land to the North of Pinchington Lane, Greenham, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the North of Pinchington Lane Greenham Newbury	
Number of residential units proposed	Net additional units	157
	Gross (total) units	157

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	17/01096/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	20/02546/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, applications pending	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	The landowner is
Is the site currently for sale or being marketed by a land agent?	Recently sold
Is there current interest from a developer?	Recently sold
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

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5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
N/A

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

-

10. Additional comments

-

Completed by: James Bull

Position: Director

Organisation: Rivar Ltd

Date: 12.9.2022

HSA5
Land at Lower Way, Thatcham

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Lower Way, Thatcham	
Number of residential units proposed	Net additional units	91
	Gross (total) units	91

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Pending a resolution to grant
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	18/00964/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Background work has been undertaken as far as possible in advance of the decision being issued.	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No – but we have a option to purchase
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes Persimmon will deliver the development
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

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5. Anticipated annual build out rates		
Up to 2039	2022/23	0
	2023/24	30
	2024/25	50
	2025/26	11
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>The prompt discharge of pre-commencement conditions</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>n/a</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

n/a

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

n/a to this form.

10. Additional comments

Completed by: L Jackson

Position: Head of Planning

Organisation: Persimmon Homes

Date: 13.09.22

HSA 7
St Gabriel's Farm, The Ridge, Cold Ash

Part 2: Information on site deliverability

1. Site details		
Site address	St Gabriels Farm, The Ridge, Cold Ash	
Site size (ha)		
Number of residential units proposed	Net additional units	5
	Gross (total) units	5
	Number of Affordable Homes	0

2. Planning status			
Is the site allocated in the Development Plan?	Yes	<input checked="" type="checkbox"/>	No
Does the site have planning permission?			Application Reference
	Outline		Yes: 16/02529/OUTD
	Reserved Matters		Yes: 19/00832/REM
	Full		
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	No. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Construction underway		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning	

permissions?	
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4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Construction commenced – units to be delivered mid\late 2023.

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	0
	2022/23	2
	2023/24	3
	2024/25	0
	2025/26	0
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies _____

Position: Director _____

Organisation: T A Fisher & Sons Ltd

Date: 6th September 2022

HSA 9
Proposed Care Home at Stonehams Farm, Tilehurst

Part 2: Information on site deliverability

1. Site details		
Site address	Stoneham's Farm, Long Lane, Tilehurst	
Number of residential units proposed	Net additional units	0
	Gross (total) units	0

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Full Planning Approval
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	N/A
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	No
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Started on site Sept 22

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	✓
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

None

Completed by: Grant Jensen

Position: Senior Property Development Manager

Organisation: Barchester Healthcare Ltd

Date: 29th September 2022

HSA 10
Stonehams Farm, Tilehurst

Part 2: Information on site deliverability

1. Site details		
Site address	STONEHAM PARK, TILEHURST, READING, RG31 5BP	
Number of residential units proposed	Net additional units	
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	YES 19/01667/COND1
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	YES 19/02680COND2
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	YES 19/02680COND2
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	YES ALL ON A PLANNING TRACKER	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	YES AND IS IN PROGRESS WITH 32 PLOTS NOW HANDED OVER
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	N/A
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>We have all foundations now in, 32 are occupied, 7 more are expected to be occupied by the 31.12.2022 The rest in first 6 months of 2023</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	All completed June 2023
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
None we are aware of

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
no

8. Are you actively considering alternative types of development for the site? <i>Please give details</i>
N/A

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: MR GRAHAM DENTON

Position: MD

Organisation: DARCLIFFE HOMES LIMITED

Date: 5th September, 2022

HSA 11
72 Purley Rise, Purley On Thames

Part 2: Information on site deliverability

1. Site details		
Site address	72 Purley Rise, Purley on Thames, RG8 8DH	
Number of residential units proposed	Net additional units	30
	Gross (total) units	31

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	18/00878/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	21/00776/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, multiple conditions have been discharged or submitted for discharge.	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a

Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?

No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*)

No progress. RM has been submitted and conditions are being discharged to be able to start on site in the near future. Partly because of current high build costs, we are looking to delay the start date on site until approximately mid next year.

5. Anticipated annual build out rates

Up to 2039

2022/23

2023/24

Circa 15

2024/25

Circa 16

2025/26

2026/27

2027/28

2028/29

2029/30

2030/31

2031/32

2032/33

2033/34

2034/35

2035/36

2036/37

2037/38

2038/39

Post 2039

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

Yes there are multiple potential external influences such as rising build costs, rising interest rates and changes in house prices which could affect the timing of the development.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

No

Completed by: George Andrews

Position: Land & Planning Assistant

Organisation: Shanly Homes

Date: 05/10/22

HSA 12

Land adjacent to Junction 12 of M4, Bath Road, Calcot

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Dorking Way, Calcot	
Number of residential units proposed	Net additional units	199
	Gross (total) units	199
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes. 19/01544/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharged	

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Yes

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Site is under construction.

5. Anticipated annual build out rates		
Up to 2039	2022/23	43 market, 41 affordable
	2023/24	16 market
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Pippa Paton

Position: Graduate Planning

Organisation: Bellway Homes, (Thames Valley)

Date: 04/10/2022

HSA 13
Land adjacent to Bath Road and Dorking Way, Calcot

Part 2: Information on site deliverability

1. Site details		
Site address	Land Adj Bath Road and Dorking Way, Calcot	
Number of residential units proposed	Net additional units	9
	Gross (total) units	9

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Does the site have full planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	Live applications 17/02904/OUTMAJ and 22/01836/FULEXT
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/A	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Live Applications 17/02904/OUTMAJ and 22/01836/FULEXT. The full application is for a Care Home. This will look to be commenced as soon as permission is granted. The outline application will be subject to further planning submissions for reserved matters.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	Up to 9 dwellings
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>None within the client/land owners control.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

Yes – Large part of the site is proposed for the erection of a 70-bed Care Home

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Abi Peacock

Position: Planner

Organisation: Walsingham Planning

Date: 28/09/2022

HSA 14
Field between A340 & The Green, Theale

Part 2: Information on site deliverability

1. Site details		
Site address	Land between the A340 and The Green, Theale	
Number of residential units proposed	Net additional units	104
	Gross (total) units	104

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes – 19/01172/OUTMAJ granted on 15th December 2020
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	An application for reserved matters is likely to be submitted in 2023 following appointment of a developer.
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See above
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking	No

to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	Yes
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*)

Outline planning permission for residential development of up to 104 dwellings was granted in December 2020. A developer is expected to be appointed shortly. Following appointment of a developer and subject to reserved matters approval, it is anticipated that development could commence in 2023/24.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	
	2024/25	25
	2025/26	50
	2026/27	29
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? *Please give details*

No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Jonathan Sebbage

Position: Associate Planner

Organisation: Savills

Date: 02 / 09 / 2022

HSA 15

Land adjoining Pondhouse Farm, Clay Hill Road, Burghfield Common

Part 2: Information on site deliverability

1. Site details		
Site address	Land adj Pondhouse Farm, Clay hill Road, Burghfield Common	
Number of residential units proposed	Net additional units	100
	Gross (total) units	100

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes 18/02485/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes 22/00325/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes Condition 8 discharged, following condition discharge applications have been submitted for conditions; 6, 7, 8, 9, 10, 11, 13, 16, 19, 24, 12,14, 17, 20, 25, 2, 3, 4 and 13 which are pending consideration.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Start on site is anticipated in November 2022</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	18
	2023/24	52
	2024/25	30
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: Ed Barton

Position: Land Negotiator

Organisation: Croudace Homes

Date: 28th September 2022

HSA 17
Land to the north of A4, Woolhampton

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the north of A4 Bath Road, Woolhampton	
	<ul style="list-style-type: none"> Planning application ref: 16/01760/OUTMAJ; 18/00997/RESMAJ; 19/00772/RESMAJ Local Plan policy ref: HSA17 	
Number of residential units proposed	Net additional units	35 - not proposed, as built and completed
	Gross (total) units	

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Completed site
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability *(please give details)***Is the landowner still supportive of the development of the site?****Is the site owned by a developer?****Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?****Is the site currently for sale or being marketed by a land agent?****Is there current interest from a developer?****Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?****4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated** *(please give details)*

5. Anticipated annual build out rates

Up to 2039	2022/23	Completed site
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

[illegible]

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

[illegible]

8. Are you actively considering alternative types of development for the site? *Please give details*

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: Guy West

Position: MD

Organisation: Westbuild Homes

Date: 5 September 2022

HSA 18
Land east of Salisbury Road, Hungerford

Part 2: Information on site deliverability

1. Site details		
Site address	Salisbury Road, Hungerford, West Bekrshire. RG17 0LR	
Number of residential units proposed	Net additional units	
	Gross (total) units	100
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	16/03061/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	19/01406/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	???
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes. All Outline & Reserved Matters Conditions have been discharged	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	No

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>95 units complete. 5 roofed in and near completion</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	100
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>No</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Matthew Brook

Position: Technical Manager

Organisation: Bewley Homes

Date: 05/10/2022

HSA 19
Land adjoining Lynch Lane, Lambourn

Part 2: Information on site deliverability

1. Site details		
Site address	Land adjoining Lynch Lane, Lambourn, Hungerford, Berkshire, RG17 8QG	
Number of residential units proposed	Net additional units	80 - 105
	Gross (total) units	80 - 105
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below 'Site Promotion Activity : Summary' for detailed information.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Does the site have full planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	See below
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/a	

Site Promotion Activity : Summary

The applicant has engaged in pre-application discussions with the Local Planning Authority (pre-application reference: 20/00093/PREAPP). These have confirmed that the site is currently allocated within the Housing Site Allocations Development Plan Document (HSA DPD May 2017) so the principle of development is in accordance with Policy HSA19 and acceptable in policy terms. The pre-application response has recognised that further design work, to finalise an appropriate layout (and establish a sustainable number of units) in line with the Local Planning Authority's feedback, is needed. In response to this, the applicant is currently undertaking further design work / due diligence to revise the proposals. This is in order to front-load any requirements, to ensure the planning application process is straightforward – this underpins the applicant's aspiration to achieve a timely, favourable determination and commence development on the site to deliver much-needed residential development.

During the pre-application process, a response was also received from West Berkshire Council's Highways department. Positively, this response posed no objections in principle to the development proposals and recognised the allocated, thus acceptable-in-principle, nature of the site. Similarly, the Highways Department supported the provision of two access points serving the development. In this way, the acceptable nature of the site from a highways perspective, is evident. Whilst recognising that the quantum of development sought by the applicant is larger than the quantum of units allocated for development in the HSA DPD (May 2017), it must be noted that no objections have been raised by the Highways Department on unit numbers. Instead, the preparation of documentation to support a formal planning application (including a Transport Assessment, Travel Plan etc) has been recommended by the Highways Department to inform and justify the proposals.

In light of the positive feedback received both from the Local Planning Authority and the Highways Department, demonstrating the readily available nature of the site and its lack of constraints, the applicant is working on a scheme to take into account the comments received during the pre-application exercise. This work, which will be finalised imminently, will inform the layout submitted as part of the formal planning application. As the site is not subjected to planning constraints, and can readily accommodate residential development, the applicant is undertaking this substantial amount of work at this stage to front-load any planning requirement as much as possible. This is not only to ensure the robustness of the proposals but, ultimately, seeks to minimise delays in light of the unprecedented pressures Local Planning Authorities are experiencing. The applicant is looking to submit a planning application imminently and commence work on site within the next year / as soon as planning permission is achieved. The sole issue to resolve is the capacity of, and yield of, the site (unit numbers).

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes – Hygrove Homes Ltd
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – Hygrove Homes Ltd is looking to develop the site themselves
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	Yes – Hygrove Homes Ltd. NB : Notwithstanding Hygrove Homes' interest and ownership of the site, considerable and strong interest has also been expressed from a number of parties.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
In light of the disruption caused by the pandemic, it is evident that the applicant's aspirations for the site have been somewhat delayed due to the unprecedented nature of the global events both the public and private sector have been subjected to. Notwithstanding this, as outlined in Section 2 (Planning Status) of this document, the applicant has spent the last year or so engaging in pre-application discussions with multiple interested parties, including (but not necessarily

limited to) the following: the Local Planning Authority; the Parish Council; Thames Water; Lambourn Trainers; Archaeologists; Ecologists; and the Highway Safety Team.

At present, the applicant is finalising the design element of the proposals. It is, therefore, anticipated for a planning application to be submitted imminently, and for development on site to begin within the next year, subject to planning.

5. Anticipated annual build out rates

Up to 2039	2022/23	
	2023/24	Nil – infrastructure provision
	2024/25	20
	2025/26	40
	2026/27	40
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? *Please give details*

There are no issues affecting the achievability, economic viability or timing of the development of this site. The site is fully owned by Hygrove Homes Ltd who are committed to securing planning permission / developing the site and, crucially, have the funds to do so. In this way, given the inherent financial viability of any scheme brought forward, the uncomplicated ownership position and the allocation of the site for residential development, the site benefits from realistic prospects of being delivered within the plan period.

As recognised in Section 4 (Development Progress) of this site, whilst the Covid-19 pandemic has not impacted on the delivery on this site, it is evident that delays have been experienced across both the public and private sector not least in obtaining a pre-application response from the Local Planning Authority (July 2020) to the formal enquiry submitted by the applicant (May 2020). This exercise, the aim of which was to obtain a steer from the Local Planning Authority regarding the principle of development on the site took over three months. Whilst completely understandable, in light of the circumstances, it is evident that these delays have impacted upon the applicant's timescales. For this reason, to avoid being subjected to further delays, the applicant is now effectively front-loading a formal planning application submission to ensure all due diligence is undertaken and that the determination process can be as streamlined as possible in order to deliver much-needed new housing.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No – the applicant is committed to delivering high-quality residential development on site and is finalising the layout for the formal planning application in the interest of best-practice and a favourable determination for the proposals.

8. Are you actively considering alternative types of development for the site? Please give details

No – the site is suited for housing, as allocated.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? Please give details

Overall, in light of the above, it is evident that the applicant is committed to working with the Local Planning Authority to deliver a comprehensive sustainable development, providing much-needed homes in West Berkshire. Ultimately, the site is suitable, available for development and considered to be in a sustainable location for residential development – this is demonstrated by the feedback received during the pre-application exercise, both by the Local Planning Authority and the Highways Department, and its current allocation in the HSA DPD (May 2017) which must be retained in the interest of residential delivery. It is not considered that the site has any constraints which could restrict development despite the ongoing effects of the Covid-19 pandemic – instead, the applicant has utilised the delays of the last 18 months to engage in pre-application discussions, finalise a robust layout in line with the local planning authority's aspirations, and to (imminently) submit a formal planning application. This is in order to commence development on the site as soon as possible so that this viable site can make a meaningful contribution to West Berkshire in terms of housing provision as well as associated health, wellbeing and community benefits in line with local and national Planning Policy.

10. Additional comments

The site is suitable, available, viable and deliverable for much needed housing.

Completed by: Geraint John
Position: Director
Organisation: Geraint John Planning Ltd
Date: 23rd September 2022

HSA 20
Land at Newbury Road, Lambourn

Part 2: Information on site deliverability

1. Site details		
Site address	Land at Newbury Road, Lambourn	
Number of residential units proposed	Net additional units	5-8
	Gross (total) units	5-8
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	X – see below
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/A
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes - 20/00972/FULMAJ The site is also subject of a pending planning application ref: 22/00277/FULMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No	

3. Site achievability (please give details)	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	No, although the site is under offer by Palady Homes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes – Palady Homes will be developing the site
Is the site currently for sale or being marketed by a land agent?	Yes and as above the site is under offer by Palady Homes
Is there current interest from a developer?	Yes as above
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	As above

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (please give details)
<p>As set out above the site has planning permission for 8 units although the site is subject to a subsequent planning application for 5 units. The application was submitted in February 2022, although little progress has been made with Officers to date and the site is now subject to being Nutrient Neutral.</p>

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5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	5 (subject to the grant of planning permission)
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>The main matter affecting the timing of development is the timing of a grant of planning permission for the 5 unit scheme.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

No

Completed by: Kerry Pflieger

Position: Director

Organisation: RAW Planning Ltd

Date: 04.10.2022

HSA22
Land off Stretton Close, Bradfield Southend

Part 2: Information on site deliverability

1. Site details		
Site address	<i>Land off Stretton Close, Bradfield,</i> <ul style="list-style-type: none"> • Planning application ref: 20/02410/RESMAJ and 17/03411/OUTMAJ • Local Plan policy ref: HSA22 	
Number of residential units proposed	Net additional units	11
	Gross (total) units	11

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	SITE HALF WAY THROUGH CONSTRUCTION	

3. Site achievability *(please give details)***Is the landowner still supportive of the development of the site?****Is the site owned by a developer?****Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?****Is the site currently for sale or being marketed by a land agent?****Is there current interest from a developer?****Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?****4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated** *(please give details)*

4 PLOTS WILL BE BUILT AND SOLD THIS YEAR WITH THE REMAINDER NEXT YEAR.
 (Half way through construction)

5. Anticipated annual build out rates

Up to 2039	2022/23	4
	2023/24	7
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details**7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details**

8. Are you actively considering alternative types of development for the site? *Please give details*

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

10. Additional comments

Completed by: GUY WEST

Position: MD

Organisation: WESTBUILD HOMES

Date: 5/9/22

HSA23
Pirbright Institute Site, High Street, Compton

Part 2: Information on site deliverability

1. Site details		
Site address	Former Pirbright Institute, High Street, Compton, Newbury, RG20 6NY	
Number of residential units proposed	Net additional units	160
	Gross (total) units	160
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	No
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	20/01336 Awaiting final engrossments of s106 agreement and issuing of decision notice
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	TBC following disposal process which is ongoing RM to be submitted by developer following demolition works (being carried out by Homes England)
Does the site have full planning permission?	Yes. Please provide the planning application reference	n/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	n/a
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	N/a	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes via Homes England Development Partner
Is the site currently for sale or being marketed by a land agent?	Yes
Is there current interest from a developer?	Yes
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	Not at this stage however bids close imminently which will lead to decision making and an Agreement for Lease

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>A hybrid planning application is pending imminent determination. The application seeks full permission to undertake extensive demolition and remediation work to de-risk and unlock the site together with outline permission for up to 160 homes.</p> <p>Work to procure a specialist works contractor has concluded and they are mobilising pending issuing of the planning decision. Work to prepare an EPSML for submission to Natural England is at an advanced stage.</p> <p>It is anticipated that a Development Partner will be selected during the latter part of FY22/23. Once selected, and whilst the enabling works are underway, they will seek to secure Reserved Matters consent. Following completion of the works, they will take control of the site and commence delivery at pace.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	50

	2025/26	50
	2026/27	60
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No

8. Are you actively considering alternative types of development for the site? Please give details

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

n/a

Completed by: Mike Harris

Position: Senior Planning & Enabling Manager

Organisation: Homes England

Date: 28/09/2022

HSA24
Land off Charlotte Close, Hermitage

Part 2: Information on site deliverability

1. Site details		
Site address	Land off Charlotte Close, Hermitage, Thatcham	
Number of residential units proposed	Net additional units	16
	Gross (total) units	16

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. Please see below.
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No. Please see below.
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes. Reference 20/00912/FULEXT.
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, discharge of conditions applications have been submitted, with application 22/01039/COND1 outstanding at time of writing.	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes.
Is the site owned by a developer?	Yes. Deanfield Homes Limited.
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Development will be built out by Deanfield Homes.
Is the site currently for sale or being marketed by a land agent?	No.
Is there current interest from a developer?	See above.
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A.

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
Full planning permission has been granted and progress has been made on the subsequent discharge of conditions.

5. Anticipated annual build out rates		
Up to 2039	2022/23	Development anticipated to commence in Oct '22.
	2023/24	16 dwellings.
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? Please give details

Delays encountered in receiving the discharge of conditions approvals from the Council are delaying commencement of this site.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Please give details

No.

8. Are you actively considering alternative types of development for the site? *Please give details*

No.

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No.

10. Additional comments

No.

Completed by: Simon Handy

Position: Director – Head of Oxford Planning

Organisation: Strutt & Parker

Date: 15/09/2022

HSA25

Land to the south east of the Old Farmhouse, Hermitage

Part 2: Information on site deliverability

1. Site details		
Site address	The Old Farmhouse, Newbury Road, Hermitage	
Site size (ha)		
Number of residential units proposed	Net additional units	21
	Gross (total) units	21
	Number of Affordable Homes	8

2. Planning status			
Is the site allocated in the Development Plan?	Yes	x	No
Does the site have planning permission?			Application Reference
	Outline		17/03290/OUTMAJ
	Reserved Matters		No
	Full		No
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.	RM submitted.		
Does the site have prior approval for change of use to residential?	No. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	No		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Delays due to WBC refusing s.73 application to amend the parameters plan necessitating a needless appeal resulting in costs being awarded against the Council and needless delays in delivery.

Site start anticipated Spring '22 assuming WBC approve the RM application.

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	
	2021/22	
	2022/23	
	2023/24	
	2024/25	16
	2025/26	5
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S J Davies _____

Position: _____ Director _____

Organisation: T A Fisher & Sons Ltd _____

Date: 6th September 2022 _____

Stratfield Mortimer Neighbourhood Plan Allocation
Land to the south of St. John's School, The Street, Mortimer

Part 2: Information on site deliverability

1. Site details		
Site address	Land to the South of The Street, Mortimer Common	
Site size (ha)		
Number of residential units proposed	Net additional units	110
	Gross (total) units	110
	Number of Affordable Homes	44

2. Planning status			
Is the site allocated in the Development Plan?	Yes	<input checked="" type="checkbox"/>	No
Does the site have planning permission?			Application Reference
	Outline		17/03004/OUTMAJ
	Reserved Matters		Phase 1 (28 of 110) Approved Phase 2a (16 of 110) Approved Phase 2b (14 of 110) Approved
	Full		
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.	Phase 1, 2a & 2b approved (58 of 110) Phase 3 to be submitted later this year.		
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre-commencement conditions on Phase 2a discharged		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the	

landowner dependent on the site gaining residential planning permissions?

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Phase 1 (28 units) build complete. Phase 2a (16 units) under construction. Phase 2b to commence late 2022

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	11
	2022/23	23
	2023/24	10
	2024/25	40
	2025/26	26
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies

Position: Director

Organisation: T A Fisher & Sons

Date: 6th September 2022

Large and Medium Sites with Planning Permission at March 2022

16/02330/FULEXT
Beansheaf Farm, Bourne Close, Holybrook

Part 2: Information on site deliverability

1. Site details		
Site address	Beansheaf Farm, Old Grange Close Calcot Reading, RG31	
Number of residential units proposed	Net additional units	27 (24 completed and 21 sold)
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No we have full planning – see below
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	No we have full planning – see below
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes (18/02937/FULEXT)
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes, only 1 outstanding condition	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Currently in development (almost complete)
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	No
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	N/A

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>24 units out of 27 have been completed and 21 sold.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>	
No	

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>	
No	

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

Completed by: Rachel Taylor

Position: Executive Assistant

Organisation: Beansheaf Developments Number One Limited

Date: 28th September 2022

16/00547/FULEXT
Market Street, Newbury

Part 2: Information on site deliverability

1. Site details		
Site address	Market St, Newbury	
Number of residential units proposed	Net additional units	
	Gross (total) units	
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	N/a
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes, 16/00547/FULEXT
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>		

3. Site achievability *(please give details)*

Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	Lettings are being marketed direct and through Agents
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated *(please give details)*

Out of a 7 phases, of which 5 are residential; 1 non-residential section has been completed (the Market Street Car Park).

Additionally Phase 1 which consists of 2 blocks (A – Bambooo; and C, Purl House) have been delivered.

Other phases are in progress and due to complete between Oct 22 and July 23

5. Anticipated annual build out rates		
Up to 2039	2022/23	34 – completed 26 in Dec22 / Jan 23 113 – Mar 23
	2023/24	59 Jun 23
	2024/25	0
	2025/26	0
	2026/27	0
	2027/28	0
	2028/29	0
	2029/30	0
	2030/31	0
	2031/32	0
	2032/33	0
	2033/34	0
	2034/35	0
	2035/36	0
	2036/37	0
	2037/38	0
	2038/39	0
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>Timing is only dependant on availability of resources (labour and materials)</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>No</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

None

Completed by: Cullum Alexander

Position: Associate Director – Direct Development

Organisation: Grainger

Date: 30/09/22

19/02140/FULMAJ
Westminster House, Bath Road

Part 2: Information on site deliverability

1. Site details		
Site address	Westminster House, Bath Road Padworth	
Number of residential units proposed	Net additional units	13
	Gross (total) units	13

2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	19/02140/FULMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre commencement conditions discharged. Negotiating revision to S106	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	n/a
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	n/a

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
Construction on site commenced, completion due 3 rd quarter 2023

5. Anticipated annual build out rates		
Up to 2039	2022/23	All Units (13)
	2023/24	
	2024/25	
	2025/26	
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
<p>Specification changes and cost and increases are threatening viability. Need to use Air Source Heat Pumps.</p>

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
<p>See above</p>

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

Current uncertainty may influence completion date

10. Additional comments

Completed by: Mark Barrett

Position: Chairman

Organisation: Gables Homes Ltd

Date: 3-10-2022

18/03061/RESMAJ

14/02480/OUTMAJ

Land adjacent to Hilltop, Oxford Road, Donnington, Newbury: West

Part 2: Information on site deliverability

1. Site details		
Site address	Donnington Heights, North Newbury, Land to the North of A339, RG14 2FN	
Number of residential units proposed	Net additional units	
	Gross (total) units	222
2. Planning status		
Does the site have outline planning permission?	Yes. Please provide the planning application reference	Yes 19/00442/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have reserved matters permission?	Yes. Please provide the planning application reference	Yes 20/02788/RESMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Does the site have full planning permission?	Yes. Please provide the planning application reference	Yes 14/02480/OUTMAJ
	No. Please indicate what progress has been made on a full application and when it is likely to be submitted to the Council	
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes	

3. Site achievability <i>(please give details)</i>	
Is the landowner still supportive of the development of the site?	Yes
Is the site owned by a developer?	Yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated <i>(please give details)</i>
<p>Plots 1-34 and 179-197 are constructed to roof (53 plots), rising on brickwork with Plots 134-178 (45 plots). 50% of services are in and 90% of adoptable roads have been installed but only around 25% are surfaced.</p>

5. Anticipated annual build out rates		
Up to 2039	2022/23	60 up to March 2023
	2023/24	55 up to March 2024
	2024/25	55 up to March 2025
	2025/26	52 up to March 2026
	2026/27	
	2027/28	
	2028/29	
	2029/30	
	2030/31	
	2031/32	
	2032/33	
	2033/34	
	2034/35	
	2035/36	
	2036/37	
	2037/38	
	2038/39	
Post 2039		

6. Are there any issues that may influence the achievability, economic viability or timing of the development of this site? <i>Please give details</i>
No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? <i>Please give details</i>
No

8. Are you actively considering alternative types of development for the site? *Please give details*

No

9. Do you have any additional comments to make regarding the planning application / site or the current housing market? *Please give details*

No

10. Additional comments

N/A

Completed by: Ryan Chapman

Position: Technical Manager

Organisation: David Wilson Homes

Date: 06.10.2022

18/03209/FULEXT
19 and 19A High Street, Theale

Part 2: Information on site deliverability

1. Site details		
Site address	19 & 19a High Street, Theale	
Site size (ha)		
Number of residential units proposed	Net additional units	15
	Gross (total) units	15
	Number of Affordable Homes	0

2. Planning status			
Is the site allocated in the Development Plan?	Yes		No x
Does the site have planning permission?			Application Reference
	Outline		
	Reserved Matters		
	Full		APP/W0340/W/19/3243107
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Pre-commencement conditions cleared		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	yes
Is the site owned by a developer?	yes
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	yes
Is the site currently for sale or being marketed by a land agent?	no
Is there current interest from a developer?	
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning permissions?	

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Under construction

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2025	2020/21	0
	2021/22	0
	2022/23	0
	2023/24	0
	2024/25	15
	2025/26	0
Post 2026	2026 – 2031	0
	2031 -2037	0
	Beyond 2037	0

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

No

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

No

Completed by: S Davies

Position: Director

Organisation: T A Fisher & Sons

Date: 6th September
2022 _____

**Sites identified through the Prior Approval process (10 or more dwellings)
at March 2022**

18/00631/PACOU

18/02279/PACOU

Emerald House, Newbury Business Park

From: Mountley Group <[REDACTED]>
Sent: 02 September 2022 15:50
To: PlanningPolicy
Subject: Re: West Berkshire Council Housing Trajectory & Five Year Housing Land Supply

Follow Up Flag: Follow up
Flag Status: Flagged

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

***Emerald House, Newbury Business Park, Newbury 109 FLAT READY IN OCTOBER 2022
NO OTHERS***

Thank you , kind regards



Hersch Schneck

Director

p: [REDACTED]

a: [REDACTED]

w: www.mountley.co.uk e: [REDACTED]

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On Fri, 2 Sept 2022 at 15:23, PlanningPolicy <PlanningPolicy@westberks.gov.uk> wrote:

Dear Developer,

West Berkshire Council are commencing an update of the five year housing land supply. National planning policy requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.

In addition, the Council are preparing a housing trajectory to inform the West Berkshire Local Plan Review to 2039. The housing trajectory will demonstrate how the anticipated housing delivery (which will include allocated sites and non-allocated sites with planning permission) will meet the housing requirement.

In order to ensure that the Council's assessment of the deliverability of sites is robust, we would be grateful if you could please complete the attached form for the following site, and return it by email to the Planning Policy Team by **5pm on Friday 30 September 2022:**

- Site name: *Emerald House, Newbury Business Park, Newbury*
- Planning application ref: *18/00631/PACOU and 18/02279/PACOU*
- Local Plan policy ref: *N/A*

If you have any queries about this request, please do not hesitate to get in touch.

With thanks in advance.

Kind regards,

Planning Policy Team

Development and Regulation | West Berkshire Council | Market Street | Newbury | RG14 5LD

01635 519 111 | planningpolicy@westberks.gov.uk

<https://info.westberks.gov.uk/planningpolicy>

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18/01904/PACOU
Bayer House, Strawberry Hill

Part 2: Information on site deliverability

1. Site details		
Site address	Bayer House Strawberry Hill Newbury RG14 1JA	
Site size (ha)	1.45687 Hectares	
Number of residential units proposed	Net additional units	
	Gross (total) units	191 Apartments as per Planning Application
	Number of Affordable Homes	N/A

2. Planning status			
Is the site allocated in the Development Plan?	Yes	X	No
Does the site have planning permission?			Application Reference
	Outline		
	Reserved Matters		
	Full		18/01904/PACOU - Granted
For sites without full permission please indicate what progress has been made on reserved matters or full application and when it is likely to be submitted to the Council.			
Does the site have prior approval for change of use to residential?	Yes. Please provide the planning application reference		18/01904/PACOU - Granted
Has any progress been made on discharging planning conditions? <i>Please provide details</i>	Yes – Pre-commencement Condition No 6 Discharged – Planning Ref: - 21/01287/COND1		

3. Site achievability (please give details)	
Is the landowner supportive of the development of the site?	Yes
Is the site owned by a developer?	No
Are you (or the landowner if being completed by the site promoter) looking to develop the site yourself?	Yes
Is the site currently for sale or being marketed by a land agent?	No
Is there current interest from a developer?	N/A
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining residential planning	No

permissions?

4. What development progress has been made to date? If there has been no progress, please explain why and state when a start on the site is anticipated (*please give details*). If the site had a previous permission which has not been implemented please explain why.

Strip-out has been completed. Looking to commence development early 2022

5. Anticipated annual build out rates (1 April to 31 March)

Up to 2027	2021/22	£1 Million
	2022/23	£12.3 Million
	2023/24	
	2024/25	
	2025/26	
	2026/27	
Post 2027	2027 – 2032	
	2032 -2038	
	Beyond 2038	

6. Has Covid-19 impacted on delivery of housing on site? Are there other issues that may influence the achievability, economic viability or timing of the development of this site, for example ownership constraints or infrastructure provision? Please give details.

Yes – timing due to resources.

7. Have there been any changes in circumstances that may mean the site is no longer suitable for residential development? Are you actively considering alternative types of development for the site? Please give details

No

8. Do you have any additional comments to make regarding the planning application / site or the current housing market which may be helpful to the Council in its update of the 5 year housing land supply? Please give details

Completed by: _____ Natalie Sawbridge _____

Position: _____ Administrator _____

Organisation: _____ Empire Property Concepts _____

Date: _____ 15-11-2021 _____

Appendix 10 – Case Officer Notes – Sandleford Park

SP16 – Sandleford Park East

The Council has included the delivery of 150 units from this site within the 5 year period, with delivery in 2026/7 and 2027/28. (and 100 units every year in the trajectory thereafter I thought you said the 5-year supply was to 2028/29).

The appellant has suggested that the Sandleford Park East site will deliver a smaller number of homes overall than permitted (785 rather than 1,000), (which figure was mentioned in the submitted phasing plan currently under consideration, but Bloor has not shown how they arrived at that figure) and that no reserve matters application has been submitted, there are numerous conditions that still need to be discharged and that there is an application to vary the S106 agreement. Ms Miles adds that there is no clear evidence of delivery within the next five years and therefore 250 units should be removed from the supply (looking to March 2028).

There is however clear evidence of progress. The site has an extant outline consent, granted by the Secretary of State on 6.5.2022. The developer, Bloor Homes, has carried out community engagement for the emerging consulted on detailed proposals for the site in Spring /Summer 2024.

The Case Officer has informed me (appendix XX what doc is this? Notes from our discussion?) that good progress is being made over the last two years with bringing forward development on the site. 13 of the 58 conditions on the Outline Planning Permission are effectively PRE-RESERVED MATTERS conditions for enabling infrastructure and protection measures, as and the applicants have already discharged 6 of those (ancient woodlands protection, arboricultural watching brief, badgers protection, otters and water voles protection, primary school site boundary, archaeology), along with securing 4x S96A Non-Material Amendment approvals for various adjustments /clarifications to the complex Outline decision and have currently applied to discharge another 6x PRE-RESERVED Matters conditions (Urban Design Code, Phasing Plan, Surface Water Drainage Strategy along with full details for the Central Valley Crossing, the Country Park and the required Advance Woodland Planting). There are also currently discussions on a submitted MDOPO2 Deed of Variation of the S106 Unilateral Undertaking to update, clarify and simplify various parts of the complex S106 UU.

The Case officer also confirmed that the council are reviewing and agreeing extensions of time (as necessary as part of the regular project progress update meetings with the developers) on all the outstanding discharge of conditions applications and they are on track to determine the applications in the Autumn 2024 with a view to having the first reserve matters application for infrastructure (primary and secondary roads, foul pumping station and Water Basins in the north half of the site) by the end of the year (2024) or Jan/Feb 2025 at the latest and for the first residential phase by Summer 2025.

The Council has recently confirmed to the developer (Appendix XX) that the housing mix in that approved application strikes the right balance between the policy emphasis for family housing whilst also having regard to the most up-to-date evidence on housing need. It also confirmed that as Sandleford Park East is a strategic site and will help to meet the future needs of the District and as such the approved mix should be adhered to.

Access to the site through two points on Monks Lane to the north both of which have detailed planning approval which has moved on to construction phase after approval under s278 with the Highways Department. There is also access to site from the A339 Link Road to the east and this has already been provided by the Council up to the site boundary. There is a fourth

access to the site to the west which will be the main connection between the two sites. Both developers have conditions inserted that means that this will be develop by Bloor Homes will provide the internal Primary street to that point within six years from after commencement and Donnington New Homes (SPWest) by after occupation of 200 units are built on the West site.

The developer has also engaged in this appeal (appendix XX) via their planning agent (White Peak Planning) and echoed the stance of the Case Officer. They informed us that they intend to submit the first reserve matters application before March 25 and start on-site by the end of 2025. The Council's delivery assumptions, with first completions around Autumn 2026, continue to look reasonable against this.

The planning agent also confirmed that they anticipate a build-out rate of across two outlets of 120 units per annum with 785 units being delivered within 6 or 7 years. This is higher than the Council's assumptions in the HLS Assessment. They also confirmed that they expect to deliver 360 units by the end of the 2028/29 monitoring period. They have confirmed that no issues are anticipated regarding delivery.

As the site is a retained allocation and has outline planning permission both the Council and the developer have provided the clear evidence of progress required to consider the site as developable. Therefore, rather than reducing the supply by 250 units as the appellants suggest I consider that an extra 110 units can be delivered in the next five years (a total of 360 units).

SP16 – Sandleford Park West

The appellant has suggested that this part of the allocation only has a resolution to grant for outline planning permission and that there is no evidence to justify completion (is this right? Full completion? We never said this or do they mean "any completions"?) within 5 years. Ms Miles also adds that the site is pending a S106 agreement and that no reserved matters applications have been made. As such it cannot be considered part of the five-year housing land supply and 50 units should be removed.

As stated, the site is a retained allocated site and the developer has received a resolution to grant outline planning permission with full planning details for the important Warren Road Corridor Access from the Council in Spring 2024 for a total of 360 homes. The Council's case officer has confirmed that they are in the process of finalising the 106 agreement with an extension of time agreed to 30 November 2024. (see Appendix XX).

During the examination in public of the Local Plan, the Council confirmed its position in relation to the allocation (Appendix XX). This was in response to the inspector's question about the site's allocation and their request for a main modification. To inform this response the Council liaised with the site developer Donnington New Homes.

The response confirmed the housing trajectory set out in EXAM22 (Appendix XX), based on the information known at March 2023, is still reflective of the delivery of the site and this includes 500 dwellings at Sandleford Park West including 50 within the next 5 years, in the context of the resolution for the 360 units in the smaller SPWest site and the anticipated forthcoming development of the Sanfoin site (within the settlement boundary and proposed as part of the

Sandleford Strategic Allocation in the LPReview) for the balance of 140 units as DNH informed committee when the SPW application was considered on 24th April 2024.

The SPW site is subject to a current outstanding application for 500 units at Sandleford Park West (which also includes a site known as Sanfoin). But the Council's Case Officer has informed me that they expect that this application will be withdrawn, as such it should not form part of the supply. This is overtaken by events by the resolution to grant 360 units at the smaller SPW site and the proposed allocation of Sanfoin which is anticipated to provide the balance of up to 140 units.

However, there is a smaller site of 360 units (which does not include Sanfoin) and the council has been granted an extension of time to determine the site in order to finalise an S106 agreement which includes first homes. This application is expected to be determined by the end of November. There is a resolution to approve with some amendments to the conditions.

The main road access to the west (Warren Road Corridor) will have full permission while the rest of the site is covered by reserved matters. Conditions require that the Warren Road Corridor works are carried out prior to commencement of developing housing on site and the developer has confirmed to the council that this access works will be put in place immediately to support the construction phase.

The developer has also confirmed to me via engagement (Appendix XX) that they envisaged that the S106 will be signed and the Decision Notice issued by the Council in October which is slightly sooner than the Council end of November deadline.

The developer envisages that the submission of Reserved Matters planning application(s) will then follow during 2025, with a start on building houses on site envisaged during late 2025 and into 2026. They have also confirmed that 30 homes will be delivered during 2026 with 60 units in the following years until completion in 2032. This would be a total of 90 units within the appellant's five-year period and 30 in the Council's.

As this is a retained allocation I believe that this would provide clear evidence that housing completions will begin on site within five years. Therefore, rather than removing 50 units as the appellant proposes, the housing land supply could reasonably be increased by 30 units as these were not previously included.

Appendix 11 – Sandleford Park East – Developer Email

Paul McColgan

From: Rob White <RobW@whitepeakplanning.co.uk>
Sent: 04 September 2024 12:00
To: Paul McColgan
Cc: Laila Bassett (lbassett@westberks.gov.uk); rebecca fenn-tripp
Subject: RE: Sandleford Park East

Hi Paul,

We may only literally have first completion in Q1 2026, so only 3 quarters of 30 units in that time (90), then two years of 120 units (2027 & 2028), before one final quarter of 30 units (Q1 2029) – noting my quarters are calendar not financial/completion years.

Hence, I think 12 quarters at 30 units a quarter = 360 units (i.e. you 'lose' 30 units in Q1 2026).

Hope that makes sense?

Completions are 'gross' i.e. total for OM and AH.

Regards,

Rob

Rob White

Director

BSc (Hons) | MRTPI | MIEMA | CEnv

T: 0845 034 7323

M: 07932 799028

E: RobW@whitepeakplanning.co.uk

W: www.whitepeakplanning.co.uk



WHITE PEAK Planning

Lynnfield House, 249 Church Street, Altrincham, WA14 4DZ

Click [here](#) for email disclaimer information

From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: 04 September 2024 11:50
To: Rob White <RobW@whitepeakplanning.co.uk>
Cc: Laila Bassett (lbassett@westberks.gov.uk) <lbassett@westberks.gov.uk>; rebecca fenn-tripp <Rebecca.Fenn-Tripp@bloorhomes.com>
Subject: RE: Sandleford Park East

Hi Rob,

Thank you very much for this response. This is very helpful

By basic calculations, if you deliver 30 units per quarter from Q1 2026 to Q1 2029 then you would deliver 390 units in this time.

Can you confirm that is correct (end or 2028/29 monitoring period) and can you also confirm whether these build out rates include affordable housing provision?

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508
mobile: 07827 944 637
email: pmccolgan@iceniprojects.com



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From: Rob White <RobW@whitepeakplanning.co.uk>

Sent: 04 September 2024 11:28

To: Paul McColgan <pmccolgan@iceniprojects.com>

Cc: Laila Bassett (lbassett@westberks.gov.uk) <lbassett@westberks.gov.uk>; rebecca fenn-tripp <Rebecca.Fenn-Tripp@bloorhomes.com>

Subject: RE: Sandleford Park East

Good morning, Paul, thank you for your patience with us and apologies for the delay.

However, in response to your queries I can confirm the following in relation to Sandleford Park East:

- First RM submission in Q1 2025 (i.e. before March 25)
- Start on Site Q4 2025
- First Completion Q1 2026
- Build out rate (2 outlet site) 120 units pa (6-7 years to complete at 785 units as per submitted phasing plan)
- Phasing plan – submitted version for Discon 2 remains valid, we are preparing a minor revision to reflect the submitted scheme for the central valley crossing (Discon 25), but this does not affect the residential phasing or programme
- No issues anticipated re. delivery (noting S278 for site accesses approved in in legals), and by the end of 2024 all 'Prior to Reserved Matters' Conditions will have been discharged (all submitted) and detailed technical work on infrastructure completed

I trust that this assists the preparation of your proof – any queries let me know and I will endeavour to respond promptly.

Regards,

Rob

Rob White

Director

BSc (Hons) | MRTPI | MIEMA | CEnv

T: 0845 034 7323

M: 07932 799028

E: RobW@whitepeakplanning.co.uk

W: www.whitepeakplanning.co.uk



WHITE PEAK Planning

Lynnfield House, 249 Church Street, Altrincham, WA14 4DZ

Click [here](#) for email disclaimer information

From: Paul McColgan <pmccolgan@iceniprojects.com>

Sent: 02 September 2024 11:27

To: Rob White <RobW@whitepeakplanning.co.uk>; rebecca fenn-tripp <Rebecca.Fenn-Tripp@bloorhomes.com>

Cc: Laila Bassett (lbassett@westberks.gov.uk) <lbassett@westberks.gov.uk>

Subject: RE: Sandleford Park East

Hi Rob,

No problem, the site in question is The Hollies Nursing Home, Reading Road, Burghfield Common RG7 3LZ (APP/W0340/W/22/3312261)

My contact at the council is Laila Bassett (CC'd).

An apologies again for the apparent rush on this information but I need to submit my proof by the end of this week.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED

Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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From: Rob White <RobW@whitepeakplanning.co.uk>

Sent: 02 September 2024 11:16

To: Paul McColgan <pmccolgan@iceniprojects.com>; rebecca fenn-tripp <Rebecca.Fenn-Tripp@bloorhomes.com>

Subject: RE: Sandleford Park East

Hi Paul,

I'll be catching up with Rebecaa tomorrow and will get back to you after that.

Just for 'due diligence' purposes, please can you confirm which site you are acting on and who is your client/contact at WBC.

Many thanks

Regards,

Rob

Rob White

Director

BSc (Hons) | MRTPI | MIEMA | CEnv

T: 0845 034 7323

M: 07932 799028

E: RobW@whitepeakplanning.co.uk

W: www.whitepeakplanning.co.uk



WHITE PEAK Planning

Lynnfield House, 249 Church Street, Altrincham, WA14 4DZ

Click [here](#) for email disclaimer information

From: Paul McColgan <pmccolgan@iceniprojects.com>

Sent: 02 September 2024 11:06

To: rebecca fenn-tripp <Rebecca.Fenn-Tripp@bloorhomes.com>; Rob White <RobW@whitepeakplanning.co.uk>

Subject: RE: Sandleford Park East

Dear Rebecca/Rob,

I appreciate you are just back from leave but if you could provide a response to the request below it would be really appreciated.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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From: Paul McColgan <pmccolgan@iceniprojects.com>

Sent: 29 August 2024 16:08

To: rebecca.fenn-tripp@bloorhomes.com; robw@whitepeakplanning.co.uk

Subject: Sandleford Park East

Dear Rebecca/Rob,

I have been passed your details by West Berkshire Council as I am acting as a witness on their behalf on an upcoming planning appeal.

My evidence relates to the Council's five-year housing land supply and the appellant has questioned the above sites contribution to this.

I understand that white peak planning are promoting this site and Bloor Homes are delivering it.

I was wondering if you could provide me with an update on the latest position with regard to timescales and delivery. In particular, if you could provide the intended timings relating to the reserved matters application for the first phase of development and subsequent lead-in times and build-out rates (total per annum if possible) it would be appreciated.

I understand you have recently submitted a phasing plan and if there are any changes to this please can you let me know.

If you could also confirm whether there are any issues with regard to delivery at this site it would also be appreciated?

I would appreciate a quick response due to the timescales imposed upon me by the appeal.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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Appendix 12 – Land to Rear of Broadway (Bayer Site) - Developer Email

Paul McColgan

From: Peter Lawson <peter.lawson@turley.co.uk>
Sent: 04 September 2024 08:32
To: Paul McColgan
Subject: Re: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Paul

Highly unlikely

Pete

Sent from [Outlook for iOS](#)

Peter Lawson
Senior Director

Turley

Mobile: +44 7917 327 582
Office: 0118 902 2830

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From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: Wednesday, September 4, 2024 7:19:18 AM
To: Peter Lawson <peter.lawson@turley.co.uk>
Subject: RE: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Peter,

Just following up on this one.

I understand the you are in discussions with the Council about a deed of variation to the original planning obligation to amend the triggers for payment and this is with the Council's legal team.

Can you confirm that even if the planning obligations are modified the site will not be coming forward in its present application.

Kind regards

Paul

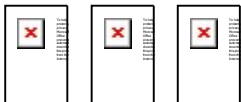
Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508
mobile: 07827 944 637
email: pmccolgan@iceniprojects.com



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From: Peter Lawson <peter.lawson@turley.co.uk>
Sent: 03 September 2024 13:07
To: Paul McColgan <pmccolgan@iceniprojects.com>
Subject: RE: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Paul

There is insufficient certainty to say that it will deliver any dwellings at all.

KR

Peter

Peter Lawson
Senior Director

Turley

Mobile: +44 7917 327 582
Office: 0118 902 2830

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From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: Tuesday, September 3, 2024 12:59 PM
To: Peter Lawson <peter.lawson@turley.co.uk>
Subject: RE: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Peter,

Sorry about that, it went into my junk mail folder.

In terms of your response, as the site is a retained allocation on brownfield land do you have any feel for the timescales involved in delivering this site and the scale of the revised scheme?

Is it likely to deliver housing in the next five years and if so how many?

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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From: Peter Lawson <peter.lawson@turley.co.uk>

Sent: 02 September 2024 11:43

To: Paul McColgan <pmccolgan@iceniprojects.com>

Subject: RE: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Paul

In summary, whilst the scheme for 72 units has the benefit of a COL, it is proving very challenging in terms of its viability, so is now highly unlikely to proceed.

Instead, we intend to approach WBDC for a pre-app in respect of a different much simpler scheme for mews houses in due course.

Hope this assists?

KR

Peter

Peter Lawson
Senior Director

Turley

Mobile: +44 7917 327 582
Office: 0118 902 2830

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From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: Monday, September 2, 2024 11:33 AM
To: Peter Lawson <peter.lawson@turley.co.uk>
Subject: RE: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Hi Peter,

Apologies for following up so soon after your break. I tried to call a moment or two ago but went straight to voicemail.

I was wondering if you could provide me with the below information asap.

Happy to field a call if that is easier.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508
mobile: 07827 944 637
email: pmccolgan@iceniprojects.com



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From: Paul McColgan
Sent: 29 August 2024 18:10
To: peter.lawson@turley.co.uk
Subject: Land to the rear of 1 – 15 The Broadway (Bayer Site)

Dear Peter,

I have been passed your details by West Berkshire Council as I am acting as a witness on their behalf on an upcoming planning appeal.

I understand that Turleys are promoting the above site on behalf of Newbarry LLP?

I was wondering if you could provide me with an update on the latest position with regard to the delivery of this site. I understand the site was being considered for auction but this is no longer the case and the site owner is now seeking to modify the S106 agreement.

I understand that the detailed consent is in place and that the development has commenced. Can you confirm this is the case and who the developer is?

Are you also able can you give an indication of the build-out rates and your intended completion date?

I would appreciate a quick response due to the timescales imposed upon me by the appeal date.

I would be happy to field a call if its easier to discuss.

Kind regards

Paul

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Appendix 13 – Land to Rear of Broadway (Bayer Site) – Case Officer Email

From: [Jake Brown](#)
To: [Laila Bassett](#)
Cc: [Debra Inston](#); [Bob Dray](#)
Subject: RE: The Hollies Appeal - Five Year Housing Land Supply
Date: 29 August 2024 17:35:47

Hi Laila,

The application is simply awaiting the completion of a deed of variation to the original planning obligation to amend the triggers for payment. I understand this is with our legal team who, due to lack of resources, have not been able to progress completion of the deed of variation. Once that has been completed, I will be submitting my recommendation for approval.

The development has commenced as confirmed by application 20/02016/CERTE and implementation of outline planning permission 14/00146/OUTMAJ has lawfully occurred within the timescales set out within the conditions of that outline planning permission.

I do not believe the development of the site is being held up by the lack of progress of the application to modify the planning obligation as the deed of variation sought will amend all but one of the triggers for payment of s106 contributions from prior to commencement of development to prior to occupation. The education contribution trigger for payment will be within 12 months from date of the agreement or first occupation (whichever occurs sooner).

In summary, there are no outstanding issues with the application other than completion of the deed of variation, but I am unable to advise when the application is likely to be determined as I have not received any updates from legal since late June.

Kind regards,

Jake

Jake Brown

Principal Planning Officer

Development and Regulation West Berkshire Council Market Street Newbury
RG14 5LD

(01635) 519447 | Ext 9447 | Jake.Brown@westberks.gov.uk

www.westberks.gov.uk

Appendix 14 – North East Thatcham – Case Officer Email

From: Vivian Ko <Vivian.Ko1@westberks.gov.uk>
Sent: Thursday, September 5, 2024 9:56 AM
To: Laila Bassett <Laila.Bassett@westberks.gov.uk>
Subject: RE: The Hollies Appeal

Hi Laila,

The Council's latest position on the delivery of NET is set out within the latest housing trajectory [EXAM54](#) Appendix A. The lead-in time has considered the time for a masterplan to be prepared and adopted as an SPD by the Council before a planning application is submitted. It is anticipated that this site will be delivered from Autumn 2030 with a build out rate of approximately 170 dwellings per annum. We think this is the quickest we can achieve re lead in time, and the North East Thatcham Partnership agreed with it.

Anticipated delivery of the site within the plan period to 2041 has been informed by the timeframe from [EXAM42](#) Annex E Table 1 and Table 2, and through discussions with the North East Thatcham Partnership when preparing the response to the latest Action Points.

Thanks,
Vivian

Appendix 15 - Lynch Lane Lambourn - Developer Email

Paul McColgan

From: Huw Francis <huwfrancis@hygrove.org>
Sent: 02 September 2024 13:28
To: Paul McColgan
Subject: Lambourn

Paul, Response to your queries in red below; let me know if you need anything further.

Regards

Huw.

Dear Huw,

Thank you once again for your time this morning.

In relation to our discussion, can you confirm if the below summary is correct.

You have been holding pre-application discussions with the Council including increasing the capacity of the site to between 70 and 120 units. **90 units.**

You expect a response from the Council by the 17th of September with regard to the pre-application discussions and will submit a full application with a month if the response is positive. **Confirmed.**

Once submitted, you anticipate the planning application to be approved within 6-12 months. The lead-in time would be around 6 months, and this work can be done concurrently with the application process.

We are advised that WB would normally take approximately 6 months. We will be working on our start on site concurrent to the application being considered and would expect to be on site within 3 months of a positive decision.

Your advisors suggested that 30-40 homes per year could be built and sold but if the market is more buoyant a faster rate of delivery could be achieved. **Confirmed.**

You also confirmed that the site is owned by Hygrove and all the engineering, topographic, and survey work has already been completed. Quantity surveyors and contractors have also been identified and that Hygrove are willing and able to deliver the site themselves. You have also held conversations with registered providers to understand what form the affordable housing contributions should take and how they will be managed. **Confirmed. Carter Jonas have been appointed to deal with the Pre ap and Planning, Charles Robinson local Estate Agents have been advising the Company on unit types, sale prices and sales flow rates, Geldards are acting on 106 obligations and all Legals relating to a Planning consent, Jason Duggan Associates are the appointed Architects who work on all our development sites. All the aforementioned have been involved on the site for a number of years and will confirm our active desire to get on site.**

Hygrove also have a strong track record of delivery in Lambourn as the surrounding site was completed by the company in 1992. **Hygrove or its associated companies own the land surrounding the applicant site. We are in discussion with the Parish Council in regard to land adjoining the site which we currently lease to the Council for leisure purposes. The Parish Council has also recently written to us to say they would like to take part of Lynch Wood which is also owned by us.**

The delay in making an application is due solely due to the Covid pandemic, then the Nitrate issue in the river Lambourn and lengthy discussions with Thames Water regarding the foul sewers at Lambourn. These matters now appear resolved hence the submission of our pre ap.

Kind regards

Paul

Huw Francis

Appendix 16 - Charlottes Close - Developer Email

Paul McColgan

From: Paul McColgan
Sent: 05 September 2024 17:26
To: Wesley.McCarthy@deanfieldhomes.co.uk
Subject: Land off Charlottes Close, Hermitage

Dear Wesley,

Please can you confirm that my note below from our conversation is accurate?

Please make changes if not.

The developer, Deanfield Homes, has highlighted the requirement to discharge conditions in relation to Nutrient Neutrality and an application is pending. This would involve upgrading a property in the catchment area which has a septic tank with a package treatment pack. This technology will then release clean water into the catchment area. This would offset the impact of the proposed development through an off-site contribution.

The developer also confirmed that it has submitted a non-material amendment to be approved by the Council. If approved, they then intend to implement the amended permission by building some road into the site and then to secure nutrient neutrality mitigation as detailed above. The developer has identified several properties with a septic tank but has not yet entered into discussions with the property owners and this will need to be secured through a legal agreement for the Council to approve it as mitigation.

Even if this process was to take a year to complete, the developer has confirmed that they could be on-site in 2026 with build-out completed within the 2026/27 monitoring year.

Kind regards

Paul

From: Wesley McCarthy <Wesley.McCarthy@deanfieldhomes.co.uk>
Sent: 05 September 2024 16:59
To: Paul McColgan <pmccolgan@iceniprjects.com>
Cc: Andrew Harvey <Andrew.Harvey@deanfieldhomes.co.uk>
Subject: RE: Land off Charlottes Close, Hermitage

You don't often get email from wesley.mccarthy@deanfieldhomes.co.uk. [Learn why this is important](#)

Good afternoon Paul,

I've tried your landline earlier. I'm available tomorrow morning on my mobile.

Kind regards,

Wesley

Wesley Mc Carthy MRTPI
Senior Planning Manager
Deanfield Homes Limited
Oakingham House, Kingsmead Business Park, HP11 1JU
W: 01494 218954
M: 07586 961602



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From: Paul McColgan <pmccolgan@iceniprojects.com>

Sent: 05 September 2024 16:29

To: Info <info@deanfieldhomes.co.uk>

Subject: Land off Charlottes Close, Hermitage

Dear Sir Madam,

Please could the person managing the above site contact me as soon as possible.

This relates to a planning enquiry I am working on.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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Appendix 17 - -Hungerford NP allocations planning history

Hungerford Pre-submission (Regulation 14) Neighbourhood Plan

Overview

- The pre-submission (Regulation 14) Hungerford Neighbourhood Plan (NP) was subject to consultation between 16 February and 29 March 2024.
- Two sites are proposed for allocation:
 - Land at Smitham Bridge Road
 - Land north of Cottrell Close
- Due to the Local Plan Review examination, the Planning Policy Team were unable to submit a response to the consultation until August 2024. This response did not raise any significant issues with the proposed allocations.

Land at Smitham Bridge Road

Site promoter:

- Philip Simmons, Donnington New Homes on behalf of the landowner (Mr. Clothier)
 - E: philipsimmons@donningtongroup.com
 - T: 01635 550 027
- Site under option to Donnington New Homes
- Site promoted for the Council's HELAA (site ref HUN7). HELAA submission documents include a concept masterplan and proposed land use plan which are all included below.

Planning policy history:

- Site was considered as part of work on the Housing Site Allocations Development Plan Document (HSA DPD).
- Promoted in 2013 for consideration within the SHLAA (site ref HUN001) by Donnington New Homes. Various technical reports were submitted in 2015, eg. landscape assessment, ecological assessment, flood risk and surface water drainage appraisal.
- Site comprised of slightly larger area – land to the east of Shalbourne Brook included.
- The site was identified as a reasonable alternative.
- It was ultimately not recommended for allocation for the following reasons:
 - whilst no significant constraints, an alternative site was considered more in keeping with the role and function of Hungerford as the largest a rural service centre in the AONB and it is not considered appropriate to allocate both sites due to the cap on development in the AONB set out in the Core Strategy.
 - Concerns over access to the site as Smitham Bridge Road is very narrow – this was a constraint that other sites did not have.
 - Some flood risk concerns.
 - While there are no significant constraints on the site, an alternative site is considered more in keeping with the role and function of Hungerford as the largest Rural service Centre in the AONB and it is not considered appropriate to allocate both sites due to the cap on development in the AONB set out in the Core Strategy.

Planning history:

- No pre-apps.
- Two planning applications which date back to 1982 and 1991:
 - 82/18346/ADD
 - 91/39688/ADD

Land north of Cottrell Close

Site promoter:

- Site was promoted directly to Hungerford Town Council as part of the call for sites for their neighbourhood plan.
- Unable to ascertain who promoted the site to the Council's SHLAA, however the site is included within a 2014 indicative layout plan submitted by Richard Nevil, Southern Management Ltd on behalf of [The Chiltern Estate](#).

Planning policy history:

- Site was considered as part of work on the Housing Site Allocations Development Plan Document (HSA DPD).
- Promoted for consideration within the SHLAA (site ref HUN006).
- Recommended as an option for allocation at preferred options as part of a cluster of five sites (HUN003, HUN005, HUN006, HUN015 and HUN020).
- The cluster of five sites were identified as a reasonable alternative.
- They were ultimately not recommended for allocation for the following reasons:
 - Adjacent to the Eddington settlement boundary, rather than being adjacent to Hungerford itself. However, it is reasonably well-located for access to the services and facilities within Hungerford.
 - Additional technical evidence and consultation responses highlighted a number of issues related to this site, in combination with the other Eddington sites. These include proximity to the Kennet and Lambourn Floodplain SAC, traffic impact on the High Street and relationship with Hungerford itself. Screening would be required if the site were developed. None of these were showstoppers, and were instead additional constraints which the other preferred option sites did not have and could impact on the viability or deliverability of sites. Development of the whole group of sites would have resulted in the loss of the garden centre which is a local employment and amenity site.

Planning history:

- None.

HUN7 Land at Smitham bridge Road, Hungerford

HELAA submission documents

KPF/P17-0141

30th March 2017

Planning Policy
West Berkshire Council
Council Offices
Market Street Newbury
Berkshire
RG14 5LD

Dear Sir / Madam

**West Berkshire Local Plan
Housing and Economic Land Availability Assessment Call for Sites
Land at Smitham Bridge Road and Marsh Lane, Hungerford**

Pegasus Group is instructed by Donnington New Homes to submit representations to the West Berkshire Call for Sites, promoting four parcels of land off Smitham Bridge Road and Marsh Lane, Hungerford for residential and community uses.

Introduction and Relevant Background

This representation promotes 4 individual parcels of land as identified on plan ref: P17_0141_01 as sites 1-4. It is envisaged that the 4 sites could come forward as a comprehensive development providing market and affordable housing (site 1), over 55's housing (site 3), permanent allotments (site 2) and public open space or a marina development (site 4). Whilst the 4 sites could provide a comprehensive housing and community facilities scheme, sites 1 and 3 could come forward for residential development independently of each other or the wider community benefits.

Site 1 has previously been promoted for residential development through the emerging West Berkshire Housing Site Allocations DPD and was known as site HUN0001 in the 2013 Strategic Housing Land Availability Assessment (SHLAA). The site was not however proposed to be allocated by the Council, for reasons surrounding its size (in relation to overall housing strategy), rather than any technical or environmental constraints (as set out further below).

Sites 3 and 4 were put forward as sites HUN011 and HUN012 (respectively) in the SHLAA. The sites were not directly promoted through the Housing Site Allocations DPD although it was promoted that should HUN001 be allocated for development HUN011 (site 3) would be permanently retained as allotments.

Site 2 has not previously been put forward for development through the Council's Local Plan process.

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Site Descriptions

The 4 sites put forward are located to the west of the market town of Hungerford, which is identified as a Rural Service Centre in the adopted West Berkshire Core Strategy (Area Delivery Plan Policy 1). Rural Service Centres are identified as Centres that provide a range of services and reasonable public transport provision and provide opportunities to strengthen their role in meeting the requirements of surrounding communities.

Site 1 is located to the south of Smitham Bridge Road as it meets North Standen Road and extends to 2.77 ha in area. The site currently comprises open grassland that extends from 114.44m AOD in the north west corner and falls to 99.84m AOD in the north eastern corner. The site is bound to the north by residential properties along North Standen Road, to the east by the River Shalbourne and Hungerford Trading Estate beyond. To the south and west is agricultural land beyond a mature tree belt. The eastern part of the site adjacent to the River Shalbourne is located in flood zone 2 and 3 and a Public Right of Way (PRoW) runs in a north east – south west direction across the site from Smitham Bridge Road through the tree belt to the south and across adjoining agricultural land.

Site 2 extends to 2.34 ha in area and is located to the north of North Standen Road and currently comprises open grassland. The site adjoins residential development along Penny Farthing Close to the east, agricultural land to the west (beyond mature hedgerow planting), North Standen Road to the south (again beyond mature hedgerow planting) and the mainline railway to the north. The site is relatively flat along its frontage with North Standen Road, gently sloping eastwards down towards properties along Penny Farthing Close and to the north towards the mainline railway.

Site 3 extends to 1.4 ha in area and is located to the north of Marsh Lane as the road turns west beyond the tunnel under the mainline railway. The site is flat and currently comprises allotments and a small parking area. The land is provided on a temporary lease and as such there is no long term security for the allotment holders. The site is adjoined by a small number of residential properties to the east and west, Marsh Lane to the south and the Kennet and Avon Canal and towpath to the north.

Site 4 extends to 3 ha in area and is located to the east of the residential properties that adjoin the eastern boundary of Site 3, and to the west of St Lawrence Church and Parsonage Lane. The site is flat and currently comprises overgrown grassland. The site is also adjoined by a small number of residential properties to the east, the mainline railway to the south and the Kennet and Avon Canal and towpath to the north. The site benefits from a vehicular access off Smitham Bridge Road, and accessed by foot off the canal towpath, which can be accessed via Parsonage lane through St Lawrence Church. The north western part of the site lies in flood zone 2 and 3.

All 4 sites are located in the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

All 4 sites are within walking and cycling distance of facilities in Hungerford Town Centre, along a level route along Smitham Bridge Road and Church Street, or via the canal towpath, as well as local primary and secondary schools. There is an existing children's play area on the corner of Smitham Bridge Road and Marsh Lane, central to the four sites.

Proposed Development / Land Use

As set out above, this representation promotes 4 individual parcels of land as identified on plan ref: P17_0141_01 as sites 1-4. It is envisaged that the 4 sites could come forward as a comprehensive development providing market and affordable housing (site 1), over 55's housing (site 3), permanent allotments (site 2) and public open space or a marina development (site 4). Whilst the 4 sites could provide a comprehensive housing and community facilities scheme sites 1 and 3 could come forward for residential development independently of each other or the wider community benefits.

Site 1 – A concept masterplan has been prepared for this site illustrating how the site could accommodate approximately 39 dwellings (at a density of 30 dph), consisting of predominantly family housing. It is proposed that development would be concentrated on the western part of the site on land lying outside flood zones 2 and 3 and to the west of the PRoW, providing an extended buffer from the flood zones. A drainage basin could be accommodated to the east of the PRoW also outside flood zones 2 and 3. Vehicular access would be to the west of existing properties facing onto North Standen Road and the existing mature tree belt would be retained. A separate pedestrian access would also be provided from the north east corner of the site providing a level walk to the town centre. Site 1 is understood to be one of few sites (together with site 3) in Hungerford that could provide residential accommodation accessible along a level route to the town centre.

An indicative road layout is shown identifying how properties could be sited along a combination of roads and private drives whilst maintaining and providing a minimum back to back distance between properties of 21m. The indicative layout also shows how proposals would retain and respect the existing PRoW in situ to the south east of residential development, along the northern western boundary of a landscape/wildlife corridor, which would also provide enhanced informal public open space between the footpath and River Shalbourne. The existing mature tree belt along the sites south and south west boundary would also be retained with the potential for enhancement.

Site 2 – As part of a comprehensive development of the 4 sites it is proposed that permanent allotments could be provided on site 2 replacing the existing allotments on site 3 which are only provided on a temporary lease, providing no security of tenure for occupants. Site 2 is larger than site 3 which is currently used for allotments and could therefore provide opportunities for additional plots either now or in the future. It is acknowledged that the northern part of the site slopes towards the main line railway and as such this part of the site may not be usable for allotments but could provide opportunities for new tree planting / landscaping. There are also opportunities to supplement existing boundary planting along the sites south and west boundaries. The relocation of allotments to site 2 would only come forward as part of residential development proposals for site 3.

Site 3 – It is proposed that site 3 could be brought forward for a low density scheme of over 55's housing and respecting the landscape context that the site sits within. Properties would be sensitively designed in terms of scale and bulk to reflect neighbouring properties. As set out above should this site come forward for residential development alternative allotment provision could be made on site 2. In conjunction with site 4 there could be opportunities to provide extended and upgraded footpath links along the Kennet and Avon Canal into Hungerford town centre. Site 3 is understood to be one of few sites (together with Site 1) in

Hungerford that could provide residential accommodation accessible along a flat route from the town centre – ideal for over 55's housing.

Site 4 – As part of a comprehensive development of the 4 sites it is proposed that site 4 could be brought forward as public open space or potentially as a marina and public open space. It is anticipated that a marina development could provide moorings for visitors wishing to stay in a secure environment with boating facilities overnight in Hungerford for holidays, and for boats to be moored and left for fixed periods of time over the peak season. Out of season, the marina could provide winter moorings, providing secure storage of boats. A suitable condition could be imposed to restrict the residential use of boats, in order to maintain the use of the marina for leisure and tourism, over the holiday seasons. Proposals for a small scale marina would provide economic support for Hungerford enabling tourists to moor in Hungerford and utilise its facilities (such as shops, pubs, restaurants). Any proposals would be considered in the context of the north eastern part of the site lying in flood zones 2 and 3.

Environmental / Technical Supporting Information

Site 1

As part of the promotion of site 1 through the West Berkshire Site Allocations DPD Donnington New Homes commissioned a number of environmental and technical reports to consider potential constraints to development. The following reports have previously been prepared and are submitted in support of this representation:

- Landscape Assessment (December 2007)
- Flood Risk and Surface Water Drainage Appraisal
- Transport Appraisal
- Extended Phase 1 Habitat Survey (July 2012)
- Updated Preliminary Ecological Assessment (September 2014)
- Otter Survey (August 2015)
- Reptile Survey (August 2015)

The findings of each report together with other relevant information regarding each matter is summarised below:

Landscape Impact

A Landscape Assessment was undertaken in 2007 concluding:

"Although the site lies within the North Wessex Downs Area of Outstanding Natural Beauty it has, in its own right, no special landscape value. It could be designated for development with limited adverse impact on the local or wider landscape character".

A Landscape Sensitivity Assessment was subsequently produced for the Council by Kirkham Landscape Planning Ltd and The Terra Firma Consultancy Ltd in 2011. The report considered Site 1 (then referred to as HUN001). The Assessment finds that the site is not on an exposed plateau and slopes inwards towards the town; it has strong boundary features; is well screened and not widely visible. The site specific assessment finds that *"Development on this site (subject to recommendations) would result in little harm to the natural beauty of the AONB"*.

The Assessment concludes that site HUN001 (together with a number of other sites) could be developed avoiding impact on the special qualities of the AONB by way of careful design and siting and retention of boundary planting. The Assessment goes on to recommend that any expansion of Hungerford is achieved through a greater number of well landscaped smaller sites which are discrete and distinct, rather than a few larger ones (as put forward in the Housing Site Allocations DPD).

The Inspector examining the Housing Site Allocations DPD and the AONB board through their representations to the Housing Site Allocations DPD have also provided support for residential development of the site in landscape terms.

The Inspectors note to the Council on allocations at Kintbury and Hungerford stated "*whilst also within the AONB, site HUN001 sits more comfortably within the existing settlement form (than HUN007)*".

The site was also the only greenfield site in Hungerford supported by the North Wessex Downs AONB Board through the Housing Site Allocations DPD. In their response to issue HW42 the AONB Board stated:

"The NWD considers that site HUN001 which was dismissed on highways grounds (that can be overcome) is an appropriate site for development without considering landscape buffers. However, there is the potential for landscape enhancement along the boundaries and to the stream corridor which would enhance the biodiversity of this edge of settlement site".

The Town Council also expressed their support for site HUN001 as part of the Housing Site Allocations DPD Examination. In their response to issue HW42 the Town Council disagrees with West Berkshire Council's conclusions that site HUN007 (the identified site for residential development in the AONB) was equally acceptable in landscape terms as site HUN001 stating that "*We have always maintained that the degree of landscape impact brought about by the development of site HUN001 would be significantly less than that of site HUN007*".

Flood Risk and Surface Water Drainage

The concept masterplan enclosed illustrates how residential development and an associated drainage basin could be accommodated on land within flood zone 1 – at low risk of flooding. The small strip of land adjoining the River Shalbourne that lies within flood zone 2 and 3 would be retained as open space, including the existing PRoW.

The Flood Risk Assessment and Surface Water Drainage Strategy concludes that residential development of the site is at a low risk of flooding from all sources and the proposed development will not increase flood risk on or off the site.

It is advised that the underlying geology of the site is such that infiltration drainage techniques are likely to be feasible within the underlying chalk and also potentially feasible through the shallow sands and gravel deposits that may also be located on-site. The existing watercourse adjacent to the eastern boundary of the site offers a potential surface water outfall for the development and is likely to be accessible via a gravity system.

Highway Impact

The Transport Appraisal advises that a satisfactory access can be achieved from North Standen Road at the north west corner of the site, creating a staggered arrangement with the newly constructed access to the residential development at Penny Farthing Close. Although relatively narrow, it is concluded that North Standen Road is sufficiently wide to accommodate two-way traffic and visibility splays of 2.4m x 43m (appropriate for a speed limit of 30 mph) can be achieved within land available.

The Appraisal anticipates that there will be an additional 18 two way vehicular trips in the am peak hour and 19 in the pm peak hour (based on a development of 35 dwellings). It is concluded that the increase in traffic as a result of the proposed development would be absorbed within the daily fluctuations of traffic and have no perceptible impact on the local highway network in terms of capacity or safety.

It is understood that as part of the Housing Site Allocations DPD preparation West Berkshire Council raised potential concern regarding access to the site due to a pinch point along Smitham Bridge Road. The Inspector examining the Housing Site Allocations DPD briefly acknowledged in his note on allocations at Kintbury and Hungerford that *"although I recognise that any additional development would result in additional vehicular movements, I experienced no problem travelling through the pinch-point – as at Kintbury it could be considered to act as an appropriate form of traffic management"*.

Ecological Impact

Various ecological surveys have been undertaken, as set out above. An Updated Preliminary Ecological Assessment was undertaken in September 2014 and subsequent Otter and Reptile Surveys have been undertaken.

The Updated Preliminary Ecological Assessment and Otter and Reptile Surveys make a number of recommendations that should be taken into account as part of any detailed proposals and site clearance/construction. Subject to the identified recommendations it is concluded that the site could accommodate residential development.

Sites 2-4

Site 2

No environmental or technical survey work has been undertaken for site 2 to date. As set out above, site 2 is put forward as potential permanent allotment land in lieu of existing temporary allotments on site 3 (should this site come forward for residential development).

With the exception of the sites location within the AONB the site is not subject to any statutory or local environmental designations. The provision of allotments on the site is not considered to be a visually intrusive use and could be assimilated into the wider landscape through landscape enhancements which in turn would provide biodiversity enhancements.

The site directly adjoins North Standen Road and as such vehicular access could be provided.

Site 3

No environmental or technical survey work has been undertaken for site 3 to date. The West Berkshire SHLAA (2013) identifies the site (HUN011) as lying adjacent to a SSSI and flood zones 2 or 3 and within a biodiversity opportunity area. The site also lies within the AONB.

The West Berkshire Landscape Sensitivity Study identifies the site as lying within Character Area LLCA8A: River Dun Valley which has an overall sensitivity rating of 'High'. The Character Area washes over the Kennet and Avon Canal corridor to the west of the town and whilst it is acknowledged that this area is sensitive in landscape terms, site 3 itself is well contained and adjoins existing low density residential development to the east and west. The site is therefore considered to relate well to existing built form and to provide an opportunity for an attractive low density residential development, within a landscaped setting.

There is an existing access into the site that currently serves the allotments on site and which could be improved and utilised for residential development. Whilst a Transport Appraisal has not been undertaken for the site to date it is anticipated that trip generation for a low density over 55's housing development would be minimal, particularly when measured against existing trip generation associated with the allotments and as such would have no perceptible impact on the local highway network in terms of capacity or safety.

A low density over 55's residential scheme would provide opportunities for landscape mitigation and biodiversity enhancement measures, including potential communal gardens and wildlife areas as well as enhancements along the Kennet and Avon Canal, including pedestrian links to the existing towpath, travelling eastwards providing access to the town centre.

Site 4

No environmental or technical survey work has been undertaken for site 4 to date. The West Berkshire SHLAA (2013) identifies the north western part of the site (HUN012) as lying in flood zone 2 and 3. The whole site also lies within the AONB and a biodiversity opportunity area.

The West Berkshire Landscape Sensitivity Study also identifies the site as lying within Character Area LLCA8A: River Dun Valley which has an overall sensitivity rating of 'High'.

At present the site is overgrown and makes little contribution to the town of Hungerford itself despite its location adjacent to the settlement boundary, St Lawrence Church and Nursery School and within close proximity of the town centre. As set out above it is envisaged that the site could come forward as part of a comprehensive development of all 4 sites to provide public open space and / or a marina for the mooring of boats. Both public open space and / or a marina would provide an opportunity to retain and enhance ecological habitat on the site as well as existing landscape features preserving the contribution the site makes to the rural character of the area whilst opening up the site for public benefit.

Should the Council be interested in the proposal of a marina, rather than informal open space, Donnington New Homes would be pleased to commission a proposed layout.

Summary

As part of the on-going preparation of a revised Local Plan and promotion of the various sites, environmental and technical reports and supporting plans will be prepared to demonstrate the sites suitability for the proposed uses.

Site Achievability

NPPF paragraph 47 requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites. To be deliverable, the NPPF requires sites to be 'available now', 'offer a suitable location for development now', and 'be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable'.

All 4 sites are under option to Donnington New Homes and are available for development now. The sites are located adjacent to the urban area of Hungerford which is identified in the West Berkshire Core Strategy as a Rural Service Centre which provide a range of services and reasonable public transport provision and therefore offers a suitable location for development. Sites 1 and 3 which are put forward for residential development, offer the opportunity to deliver modest scale residential developments that can be serviced from existing infrastructure and as such could be delivered within five years.

Summary

Donnington New Homes are promoting four parcels of land as identified on plan ref: P17_0141_01 as sites 1-4. It is envisaged that the 4 sites could come forward as a comprehensive development providing market and affordable housing (site 1), over 55's housing (site 3), permanent allotments (site 2) and public open space or a marina development (site 4). Whilst the 4 sites could provide a comprehensive housing and community facilities scheme sites 1 and 3 could come forward for residential development independently of each other or the wider community benefits.

Site 1 has been the subject of detailed environmental and technical studies as part of representations to the West Berkshire Site Allocations DPD which is due for adoption shortly. The reports together with the enclosed Concept Masterplan illustrate how the site could deliver a modest residential development that would round off existing development to the west of Hungerford whilst resulting in little harm to the natural beauty of the AONB, as supported by the AONB Board through the Housing Site Allocations DPD.

Site 3 provides the opportunity to deliver a low density residential scheme providing housing specifically for the over 55's in a landscaped setting in keeping with the sites canal edge location. In conjunction with residential development of sites 1 and 3 Donnington New Homes are proposing to bring forward sites 2 and 4 to deliver permanent allotments for the residents of Hungerford and a large area of public open space or a combination of open space and marina moorings providing both community and economic benefits to Hungerford.

All four sites are under option to Donnington New Homes and are unconstrained in terms of delivery. The sites therefore represent deliverable sites as required by the NPPF.

The four sites offer the opportunity to provide a comprehensive development of residential properties and community facilities to the west of Hungerford, however both sites 1 and 3

could come forward for residential development independently of the other sites should this be the Council's preferred approach.

I trust that the above and enclosed are of assistance to the Council in your initial consideration of sites, and we would be grateful for the opportunity to meet Officer's in due course to discuss the sites further.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'K Pfleger'.

Kerry Pfleger
Principal Planner
Kerry.pfleger@pegasuspg.co.uk

Enc.

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KEY

- 01** PROPOSED HOUSING (2.04HA)
- 02** PERMANENT ALLOTMENTS (2.34HA)
- 03** OVER 55'S HOUSING (LOW DENSITY) (1.4HA)
- 04** PUBLIC (INFORMAL) OPEN SPACE / MARINA DEVELOPMENT (3.0HA)

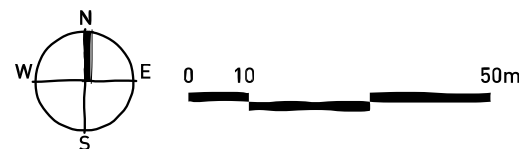
LAND OFF SMITHAM BRIDGE ROAD, HUNGERFORD - PROPOSED LANDUSE PLAN



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- KEY**
- SITE BOUNDARY (2.04HA)**
 - POTENTIAL RESIDENTIAL DEVELOPMENT PARCELS (1.3HA)**
X 30DPH = 39 dwellings
 - POTENTIAL ACCESS**
 - POTENTIAL PRIMARY ROAD**
 - POTENTIAL PRIVATE / SHARED DRIVEWAYS**
 - INFORMAL OPEN SPACE**
 - POTENTIAL ADDITIONAL LANDSCAPE BUFFER**
 - EXISTING TREE BELT**
 - POTENTIAL WATER ATTENUATION BASIN**
 - EXISTING WATERCOURSE**
 - EXISTING PUBLIC RIGHT OF WAY**
 - EXISTING TREES**
 - EXISTING CONTOURS**



LAND OFF SMITHAM BRIDGE ROAD, HUNGERFORD - **CONCEPT MASTERPLAN**

Appendix 18 – Sandleford Park West and Smitham Bridge Road - Developer Email

Paul McColgan

From: Giuseppe Zanre at Donnington Group <giuseppezanre@donningtongroup.com>
Sent: 04 September 2024 17:42
To: Paul McColgan
Subject: Sandleford Park West, New Warren Farm, Newbury; and Smitham Bridge Road, Hungerford - Timescales

You don't often get email from giuseppezanre@donningtongroup.com. [Learn why this is important](#)

Dear Paul,

Further to your previous email, please find below the information you have requested of Donnington New Homes:

Sandleford Park West: Our Planning Application No. 23/01585/OUTMAJ (for up to 360 dwellings) obtained a Resolution to Grant Outline Planning consent that the Western Area Planning Committee on 24th April 2024.

Donnington New Homes are still in the process of negotiating the S106, which has been delayed owing to the General Election and the Summer months.

It is envisaged that the S106 will be signed and sealed, and the Decision Notice issued by the Council during October.

It is envisaged that the submission of Reserved Matters planning application(s) will then follow during 2025, with a start on site envisaged during late 2025 and into 2026.

Homes will start to be delivered during 2026 – circa 30 dwellings, with an envisaged build out rate of 60 dwellings/yr to follow for the following years.

It is therefore envisaged that Sandleford Park West will be completed by 2032.

Smitham Bridge Road, Hungerford: (minimum of 44 dwellings) It is understood that the Hungerford Neighborhood Plan will be 'made' by the end of this year – 2024.

Assuming the above, a planning application is therefore envisaged to follow during 2025, with the construction and the completion of this development by the end of 2026.

Regards



Giuseppe Zanre MRTPI MRICS
Non Exec Planning Director

Appendix 19 - Lambourn NP - Council Email

Paul McColgan

From: Laila Bassett <laila.bassett@westberks.gov.uk>
Sent: 04 September 2024 17:37
To: Paul McColgan
Subject: The Hollies Appeal

Hi Paul,

Just an update on the Lambourn Neighbourhood Plan which Katherine refers to in her proof (she claims we shouldn't be relying on the allocations in the NP because no pre-submission consultation has taken place). Lambourn Parish Council have advised that they will be starting the 6-week consultation on their pre-submission (Reg 14) neighbourhood plan (NP) this Friday and this will run through to 18th Oct – see email below.

Kind regards,

Laila

Laila Bassett

Principal Planning Officer

Planning Policy | Development and Housing | West Berkshire Council | Market Street | Newbury | Berkshire | RG14 5LD
(01635) 519 540 | Ext: 9540 | laila.bassett@westberks.gov.uk
<https://www.westberks.gov.uk/planning-policy>

From: Lambourn NDP <lambourn.ndp@gmail.com>
Sent: Wednesday, September 4, 2024 4:46 PM
To: Laila Bassett <laila.bassett@westberks.gov.uk>
Subject: Lambourn NDP Pre-Submission Version

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Laila,

I wasn't sure how much detail you needed, so have included everything:

The details of the consultation are as follows:

The Consultation will run until **18th October 2024**

The Plan and the Response Form are available online at:

<https://lambourn-pc.gov.uk/lambourn-neighbourhood-development-plan/>

Hard copies may be viewed at the following locations:

Lambourn Parish Council Office, Memorial Hall, Oxford Street, Lambourn.

Lambourn Library, High Street, Lambourn.

St. James the Greater Church, Church Street, Eastbury

Responses to the Consultation should be submitted:

By email: Lambourn.ndp@gmail.com

By post: Lambourn NDP, Memorial Hall, Oxford Street, Lambourn. RG17 8XP

Anyone having difficulty accessing a copy, please contact: Lambourn.ndp@gmail.com, or call Lambourn Parish Council on 01488 72400

There will be opportunities for Parishioners to ask questions during the Consultation period, at drop-in sessions and at a public meeting:

11th September: Woodlands Drop-in: 7 – 9pm, Woodlands St. Mary Village Hall

14th September: Eastbury Drop-in: 10am – 12 Noon,
Church of St. James the Greater, Eastbury

19th September: Upper Lambourn Drop-in: 5 – 7pm, Jockey Club Estates office,
Mandown Farm, Maddingle Road.

25th September: Presentation to Lambourn Parish Council and public.
7.30pm, Memorial Hall, Oxford Street, Lambourn

If there is anything else you need, or if you have any problems accessing the material, please get back to me.

Best wishes

Sue

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Appendix 20 - Land At Newbury College - Developer Email

Paul McColgan

From: Cole Bates <Cole.Bates@felthamproperties.co.uk>
Sent: 30 August 2024 10:09
To: Paul McColgan
Subject: RE: Land at Newbury College, Monks Lane

Hello Paul,

We expect Outline consent (31 units) shortly. We will then progress an RM application as soon as possible. Build out will follow RM consent with an indicative program of 18-20 months.

With Kind Regards,

Cole Bates
Development Analyst; Feltham Properties

M: 07584686633
E: cole.bates@felthamproperties.co.uk
A: 42 London Road, Newbury, RG14 1LA

Registered Company Number: 1987699



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We are committed to sustainability and protecting the environment, therefore please do not print this email unless necessary.

From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: Thursday, August 29, 2024 5:37 PM
To: Cole Bates <Cole.Bates@felthamproperties.co.uk>
Subject: Land at Newbury College, Monks Lane

Dear Cole,

I have been passed your details by West Berkshire Council as I am acting as a witness on their behalf on an upcoming planning appeal.

I understand that Feltham Properties are promoting and intending to delivery the above site and I was wondering if you could provide me with an update on the latest position with regard to timescales.

I understand that outline permission is being sought for the development of 31 units and this will supersede the previously lapsed application for 16 units. Can you confirm this is correct?

If and when outline permission is granted can you give an indication of when a reserved matters application would be made? Can you also give an indication of the subsequent lead-in times and build out rates and your intended completion date?

I would appreciate a quick response due to the timescales imposed upon me by the appeal date.

I would be happy to field a call if its easier to discuss.

Kind regards

Paul

Paul McColgan MSc BA (Hons) MIED
Director, Economics

telephone: 020 3640 8508

mobile: 07827 944 637

email: pmccolgan@iceniprojects.com



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Appendix 21 - Land At Newbury College – Case Officer Email

From: [Matthew Shepherd](#)
To: [Debra Inston](#); [Laila Bassett](#)
Cc: [Bob Dray](#)
Subject: RE: The Hollies Appeal - Five Year Housing Land Supply
Date: 02 September 2024 13:51:18
Attachments: [RE 2301732OUTMAJ - Land north of Newbury College - Extension of time.msg](#)

Hi Laila,

Not sure if I have updated you or not but I can confirm we are looking to recommend approval subject to conditions and completion of the s106 agreement. This has been communicated to the agent as attached.

Kind Regards

Matthew Shepherd
Senior Planning Officer
Development & Regulation West Berkshire Council
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From: [Matthew Shepherd](#)
To: [James Iles](#)
Cc: [Kerri Crutchfield](#)
Subject: RE: 23/01732/OUTMAJ - Land north of Newbury College - Extension of time
Date: 02 September 2024 13:48:20
Attachments: [image001.png](#)
[image004.png](#)
[Draft Conditions 23.01732.OUTMAJ- Pro Vision comments + MS.docx](#)

Hi James,

Thank you for your email, apologies for the delay in coming back to you on this matter. Proofs of evidence, leave and prioritising the 106 agreement for the adjacent site have slowed me down in reviewing these conditions. My comments are below, happy with the changes just have a comment on the trigger of condition 14.

Can we agree an extension of time to this site the 4th October? I will provide instructions to our legal team but as previously discussed I'm hopeful we can use the other 106 agreement as a template and move forwards quickly on this site. We are looking to recommend approval of this site subject to conditions and completion of the S106 agreement.

-

Conditions

Condition 14 - Having the details prior to foundations being laid would ensure the EV charging points are located in appropriate locations where utilities can be directed to them. We would not wish to encounter a conflict over EV charging points once the foundations are laid which may require you to alter the foundations (once laid) to direct utilities. We can use the suggested 'above foundation' trigger but I would prefer to see the layout earlier than this to ensure we are all in agreement on locations prior to foundations being laid. I would image this information would come into us at reserved matters stage so again a pre commencement could be used. I would prefer to use a pre commencement condition here. Can you come back to me with your thoughts on this?

Condition 15 – Happy with the changes. I would like to see you have regard to the wider development in the area given the level of it taking place however, I accept the conditions have to be related to the development site.

Condition 24 – Open space is accepted as this follows what is in the draft 106 agreement for the adjacent site.

Kind Regards

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Appendix 22 - Land Off Faraday Road - Developer Email

Paul McColgan

From: Nicholas White <Nicholas.White@carterjonas.co.uk>
Sent: 03 September 2024 10:39
To: Paul McColgan
Subject: RE: Land off Faraday Road and Kelvin Road, Newbury [CJO-IMANAGECLOUD.FID794211]

Paul

Thank you for the notes of our discussion. Two changes. The land is owned in part by my clients Ressance / Faraday Developments who have freeholds over part of the site and the benefit of long leasehold interests across the remainder owned by West Berkshire Council.

A decision over the lotting of the site has yet to be taken although the land does divide into three main parts but ultimately the market will dictate the split.

Best wishes

Nick

Nicholas White
Partner

Carter Jonas

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51 Northbrook Street, Newbury, RG14 1DT



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Please consider the environment. Do you really need to print this email?

Classification L2 - Business Data

From: Paul McColgan <pmccolgan@iceniprojects.com>
Sent: Monday, September 2, 2024 5:41 PM
To: Nicholas White <Nicholas.White@carterjonas.co.uk>
Subject: [Ext Msg] Land off Faraday Road and Kelvin Road, Newbury

Hi Nick,

Thank you for your time earlier your input was very informative.

Hopefully the below summarises your position on the site.

The site is currently owned by West Berkshire Council (who own the freehold) and Renaissance and Faraday Investment who hold the leasehold.

An agreement is in place (but not yet signed) whereby in exchange for the freehold, West Berkshire Council receives a share of the uplift in value when the site is sold.

While the site has planning permission interest has waned and the permission is unlikely to be implemented. This is because the planning permission includes a hotel and offices component of which there is no demand in the current market and development of this type is currently not viable.

The site is therefore being sold off in three parcels. It is anticipated that the buyers will seek alternative planning permissions. Carter Jonas believes one of those parcels (Fleming Road) would come forward as commercial uses (retail/trade counters) with the other two as residential with a combined capacity of around 400 units.

Carter Jonas believes the site will be sold in early spring to get the right buyer in place. They would then expect a planning application to be submitted immediately with this taking around 18 months to be determined by the Council. CJ believe that the Council will support the redevelopment as it is the flagship site in the Bond Riverside Estate regeneration.

Once determined, the Fleming Road sites is likely to refurbished in a period of 6 to 9 months.

The residential sites however will have a lead-in time of around 9-12 months as the existing uses will need to be demolished.

The scheme could then deliver around 60-80 market units per annum. However, affordable, or extra-care could assist in a faster rate of delivery.

There is already good interest from market housing and social housing providers on the residential parcels. There is also interest from commercial companies and an EV charging company for Fleming Road.

Kind regards

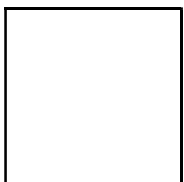
Paul

Paul McColgan MSc BA (Hons) MIED
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telephone: 020 3640 8508

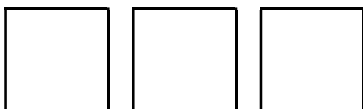
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