

# **Combined Strategic Housing Sites Appraisal Document**

## **Phase 2**

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## **Appendix Contents**

Appendix A - Sandleford Park and North Newbury sustainability tables and commentary

## 1.0 Introduction

- 1.1 This topic paper has been prepared in response to the consultation responses received during the six week consultation period prior to the submission of the West Berkshire Proposed Submission Core Strategy. The purpose of this paper is to give an overall summary of how the strategic sites and broad locations within the West Berkshire Proposed Submission Core Strategy were selected, the interpretation of the evidence base, and the assessments undertaken by officers in identifying the strategic sites most appropriate to deliver strategic development and meeting the objectives and vision of the Core Strategy. This paper follows on from the Combined Strategic Sites Appraisal Document (Phase 1)<sup>1</sup> which sets out the initial assessments and evidence base for the 15 sites that were considered as potential strategic sites for allocation within the Core Strategy, and shows how the sites to be included within the Preferred Options draft of the Core Strategy (Options for the Future<sup>2</sup>) were selected. This paper should be read in conjunction with phase 1.
- 1.2 A broad technical evidence base has been undertaken to support the Core Strategy and to identify the wide ranging issues that affect each site. The initial technical site selection process and the sustainability appraisal<sup>3</sup> are both very much the high level starting point, based on the baseline information of a red edge identifying the location of the site. The outcomes of these assessments, whilst important, can only provide a baseline view. This cannot be a precise science and therefore it is the role of policy makers to weigh up all of the evidence and make informed decisions about which sites or broad locations to move forward with. The technical evidence base needs to be evaluated to identify the key issues for each site and identify the issues which are more straightforward than others to address through mitigation, whilst

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<sup>1</sup> Combined Strategic Sites Appraisal Document <http://www.westberks.gov.uk/index.aspx?articleid=16894>

<sup>2</sup> Options for the Future <http://www.westberks.gov.uk/index.aspx?articleid=16873>

<sup>3</sup> SA/SEA <http://www.westberks.gov.uk/index.aspx?articleid=19649>

highlighting others, such as flooding, which can be a significant constraints to development. This officer assessment forms a critical and integral part of the site selection process.

- 1.3 In addition to the technical evidence base, the sites were also assessed against other factors including the vision and objectives of the emerging Core Strategy and the emerging policies. As the vision and objectives were based upon the West Berkshire Sustainable Community Strategy and the Council Plan, this was a critical part of the assessment. A key factor in the decision making process at this stage was the advice set out in Planning Policy Statement 12 (PPS12) which states in para 4.6 “Core Strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy.” As such a further critical issue for consideration was the provision of a strategic site that would help to deliver the Core Strategy as a whole, looking long term to 2026 and beyond to build in the necessary flexibility and contingency into the Core Strategy.
- 1.4 Given the nature of any development site of a strategic size it will require significant mitigation in terms of, for example, highways and landscape, as well as an assessment of the necessary infrastructure to deliver the scheme successfully in-combination with other proposed development. However, the sites also need to be assessed as to the potential to provide community facilities and benefits as part of any development. Since the Options for the Future Consultation, more technical work has been carried out. This has assessed the deliverability of the shortlisted sites including appropriate mitigation measures and has used more detailed information about the sites and how they could be delivered. This has included ongoing discussions with infrastructure providers as well as technical studies on transport and further landscape work. More information about the conclusions of these studies is set out below.
- 1.5 This topic paper concisely sets out the process undertaken by officers in identifying the strategic sites most appropriate to deliver strategic development and meeting the objectives and vision of the Core Strategy. It should read in conjunction with the Spatial Strategy and Housing Topic Paper which sets out more information about the approach to development in

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West Berkshire.

## **2.0 Sustainability Appraisal**

- 2.1 The sustainability appraisal was used, together with the initial technical evidence base, as part of the initial site assessment process. The appraisal was used to compare the sustainability aspects of the 15 promoted sites as part of the Issues and Options stage. All of the sites, to be statistically valid, had to be considered on an equal basis so that there was an established baseline of information. In order to achieve this, the sustainability appraisal was based on the red line boundary of the sites being promoted and the midpoint of the site used to form the basis of the assessment, with an assumption that the site would be developed around this point. This resulted in the sustainability appraisal providing a strategic level overview providing a broad comparison of the sites and the identification of the key issues associated with the development of these sites.
- 2.2 It has been, incorrectly interpreted, that the sustainability appraisal and the subsequent ranking should be used as the basis for identifying the strategic sites and this has become evident through the consultation period. A sustainability appraisal is an initial assessment of the sites, if this were to be the tool used to identify strategic sites there would be no further need for any technical evidence base or officer interpretation. It is necessary to use the sustainability appraisal as a starting point and then look at this together with the evidence base, and detailed site information. For example when assessing the Sandleford Park site in greater detail and assessing the proposed development area rather than the mid point of the site the scoring is significantly different and would have given an entirely different range of sustainability scores and had a dramatic effect on the ranking. However, this approach could not be taken in a consistent way at any stage during the Core Strategy process due to the differing levels of information available for each site. Therefore the most appropriate way this can be considered is by officer interpretation and analysis of the evidence base, rather than solely relying on the sustainability appraisal.
- 2.3 It also has to be appreciated that the sustainability appraisal highlighted potential sustainability issues which, although appear negative, have the potential to be fully mitigated as part of any development proposals to ensure the delivery of the site. Equally there are issues raised on

some sites which would have significant difficulty in being mitigated, and these issues need to be factored into the officers interpretation and analysis of the evidence in determining which sites are the most appropriate to deliver the strategic vision for the Core Strategy. The continued assessments are a key part of the iterative approach to the production of Development Plan Documents.

- 2.4 Appendix A shows the initial sustainability appraisal of the North Newbury and Sandford sites together with an extra column which sets out a commentary giving further information about whether any issues raised could be mitigated through the delivery of the site and how this mitigation is proposed to take place. This information was used in the site selection process.

### 3.0 Options for the Future

3.1 The purpose of the “Options for the Future” Preferred Options Core Strategy was to publicise ideas about what the options were for the sites to be included within the proposed submission Core Strategy and to seek the views of stakeholders and the public as part of the site selection process. The sites had been narrowed down from an original 15 strategic sites (defined as those sites which can accommodate approximately 500 units of development) that were promoted to the Council as a result of the earlier consultation on ‘Options for Delivering Homes’ which took place between November 2007 and January 2008.

3.2 At this stage the following sites were included for consultation:

- A preferred site for a strategic urban extension at Newbury Racecourse to the east of Newbury for 1450 homes.
- 3 options for the identification of a broad location, “reserve site” for the future expansion of Newbury/Thatcham at either:
  - Sandleford, Newbury
  - North Newbury
  - Siege Cross, Thatcham
- 5 options for delivering approximately 750-1,000 new homes in the Eastern Area:
  - Option 1: Allocation of land at Pincents Hill, adjacent to Tilehurst and the Eastern Urban Area
  - Option 2: Allocation of land at Theale
  - Option 3: Allocation of smaller developments at both Pincents Hill and Theale
  - Option 4: A number of smaller developments to be located in the settlements of the Eastern Urban Area and adjacent service centres: Calcot, Pangbourne, Purley on Thames, Theale and Tilehurst.
  - Option 5: A number of smaller developments throughout the Eastern Urban Area and including all service centres in the east: Burghfield Common, Calcot, Mortimer, Pangbourne, Purley on Thames, Theale and Tilehurst.



- 3.3 An extensive consultation exercise was carried out as part of Options for the Future. Further details about this are included within the Statement of Consultation which was published as part of the regulation 27 consultation on the proposed submission Core Strategy. In summary the consultation included a travelling exhibition, the production of leaflets and other consultation material including a 'wrap' around the Newbury Advertiser. The consultation exercise was an important part of assessing the sites and the outcome of the consultations were taken into account in conjunction with the technical evidence base and officer assessment and interpretation.
- 3.4 Between the Options for the Future consultation and the publication of the Proposed Submission Core Strategy, additional evidence and information became available both from third parties and ongoing work being undertaken by the Council and fully taken into account.

## **4.0 Evidence Base and Interpretation**

4.1 As part of preparing its Core Strategy, West Berkshire Council has commissioned a comprehensive evidence base to inform the selected development strategy; this has included:

- Sustainability appraisal
- Transport assessment
- Landscape sensitivity assessment
- Strategic flood risk assessment

In order to be equitable and for each site to be reviewed on an equal basis the initial evidence base was based upon general assessment criteria and not following any site specific review of site master plans or developable areas. As the site selection process has progressed the technical work has focussed more specifically on the delivery of the shortlisted sites.

### **4.2 Sustainability Appraisal**

The sustainability appraisal has identified wide site boundaries to show a site's entire extent and a mid-point has been chosen from which to assess the site's sustainability. The appraisal however makes no assumption regarding a site's developable area or any features which should be retained.

### 4.3 **Transport assessments**<sup>4</sup>

As a strategic development site, it is accepted by the Council that any site will have a transport impact. As such, a four phase approach has been taken to assessing and considering transport impacts. The initial phase of assessment work reviewed each site and considered the existing highways situation to determine the impacts on the existing highway network and its sustainability.

- 4.4 The next two phases have considered impacts on the general performance of the network, congestion on key roads and across key junctions and the impact on journey times. Background traffic growth is already expected to result in a significant increase in congestion and traffic growth exceeds current capacity. This means that mitigation measures are required to facilitate the development of any of the sites.
- 4.5 Phase 3 of the Transport Assessment considered the combined effect of development at Newbury Racecourse (1,500) and Sandford (1,000), as well as additional development on non-strategic sites in Newbury and Thatcham. It assesses how these sites can be delivered in transport terms and considers the impact on key junctions and network wide conditions for a number of scenarios. It does not look beyond 2026 to assess the full impact of the Sandford site for the potential full extent of up to 2,000 dwellings.
- 4.6 The junction mitigation proposed and set out within the phase 3 Transport Assessment and the Infrastructure Delivery Plan will result in fewer junctions being at or over capacity in 2026 taking into account strategic development at Newbury Racecourse and Sandford Park, than if no development were to take place at all.

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<sup>4</sup> Transport Assessments 1-4 <http://www.westberks.gov.uk/index.aspx?articleid=16893>

4.7 Additionally a phase 4 Transport Assessment has been produced specifically providing further clarity regarding the transport issues related to the Sandford Park Strategic Site, looking beyond the 2026 Core Strategy horizon for this site and to consider the impacts of a fully developed Sandford Park of up to 2,000 dwellings. This demonstrates the deliverability of the fully developed site at Sandford when looked at in conjunction with the detail of the approved planning application for Newbury Racecourse

#### 4.8 **Infrastructure Delivery Plan**

An Infrastructure Delivery Plan has been prepared to show how the development across the District can be delivered.<sup>5</sup>

4.9 This includes details of the infrastructure identified by WBC and other service providers as being needed to support the delivery of the Core Strategy. It explains the approach the Council has taken to identifying this infrastructure, their importance to the Core Strategy, how they will be delivered, and an assessment of the potential risks associated with doing so. This report also contains an Infrastructure Schedule, which summarises the infrastructure items in a comprehensive table.

4.10 Its principal role is to satisfy the requirements of Planning Policy Statement (PPS) 12 by showing how the development set out within the Core Strategy will be delivered through infrastructure provision. It does this through identifying the key pieces of infrastructure needed to achieve the objectives and policies in the Core Strategy, and identify the broad locations

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<sup>5</sup> Infrastructure Delivery Plan <http://www.westberks.gov.uk/index.aspx?articleid=19636>

where the infrastructure will be located.

- 4.11 The IDP contains information regarding the type, timing and potential costs of infrastructure needed to support the growth proposed by the Core Strategy. The IDP and its subsequent updates enable the Council to plan effectively for this growth and to maximise the potential associated with this growth to achieve wider sustainability, economic, social and environmental objectives.

#### 4.12 **Landscape sensitivity assessment**

The assessment of landscape sensitivity is based upon a wide site boundary and has considered the landscape impacts of the development of the entire site to determine a worst case scenario. This approach ensures sites are assessed equitably as master plans for each site are not available, with significantly different levels of work undertaken by landowners/developers to promote the sites.

- 4.13 It is considered that a worst case scenario assessment is robust as it allows for areas of particular landscape sensitivity to be identified and for significant impacts to be determined. This then provides a basis to further considering the sites based upon these findings to enable specific areas of development potential to be identified and similarly any areas of landscape importance which should be retained and development resisted.

#### 4.14 **Strategic Flood Risk Assessment**<sup>6</sup>

The Strategic Flood Risk Assessment has again reviewed a wide site boundary based on the red edge plans and from this identified specific flood risk areas, flooding issues or critical drainage areas that affect these sites.

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<sup>6</sup> SFRA <http://www.westberks.gov.uk/index.aspx?articleid=16930>

## **5.0 Approach to the East of the District**

- 5.1 The overall approach to growth in the Core Strategy is that development should focus on the existing settlement pattern with growth directed to the most sustainable locations. In considering the options for development, the Eastern Urban Area was identified as a potential location for new housing and associated development. The emerging Regional Strategy for the South East identified Greater Reading, which includes parts of West Berkshire, as a regional hub and focus for growth. The Eastern Urban Area was identified in the District settlement hierarchy, together with Newbury and Thatcham, as an urban area with a wide range of services.
- 5.2 The settlements in the Eastern Urban Area are, however, bounded by key environmental assets: the North Wessex Downs AONB to the west and the River Kennet to the south. Much of the River Kennet Valley is liable to flood and is therefore not regarded as a suitable or sustainable location for major growth.
- 5.3 Only two strategic sites (apart from Kennet Valley Park which was specifically excluded from the Secretary of State's proposed changes to the South East Plan and therefore not included within Options for the Future although it was assessed as a strategic site through the technical evidence base) were promoted for development in the east of the District, at Pincents Hill in Tilehurst and at Whitehart Meadow in Theale. Early assessment work, summarised in the Combined Strategic Housing Sites Appraisal document identified a number of technical and broad policy issues affecting the development of both sites meaning that neither was an obvious choice to take forward.
- 5.4 In terms of the overall delivery of the Core Strategy, there was no critical requirement to identify

a strategic site in the east of the District. Therefore a number of different approaches to accommodating growth in the east of West Berkshire were tested through consultation to see if an alternative scenario was preferable for this area. These five options for accommodating development in the east of the District were tested through the 'Options for the Future' consultation as set out in paragraph 3.2 above. These were broad options for accommodating development in and around the eastern urban area and the rural service centres in this area. The following is an overall summary of how option 4 (a number of smaller developments to be located in the settlements of the Eastern Urban area and adjacent service centres: Calcot, Pangbourne, Purley on Thames, Theale and Tilehurst) was selected as the most appropriate approach.

## 5.5 **Pincents Hill Strategic Site**

Prior to consultation and during consultation on the 'Options for the Future'<sup>77</sup> a large number of objections were received about development at the Pincents Hill site, highlighting a considerable level of concern in the local area about the potential allocation of the site through the Core Strategy. Public consultation forms an important part of the evidence base and the comments received were looked at together with the technical evidence base and policy issues as part of the decision making process.

- 5.6 An outline planning application for the Pincents Hill site, which set out a proposal for the development of up to 750 dwellings, was submitted to the Council during the summer of 2009, and this resulted in further technical information about the site being submitted and assessed through the development control process. It also resulted in a high degree of public awareness about the proposal.

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<sup>77</sup> [Statement of Consultation/ Statement of Compliance \(Reg 27\)](#)



- 5.7 Through consultation it became clear that Pincents Hill is a valued gap separating the built up areas of Theale, Tilehurst and Calcot. In policy terms, maintaining the separate identity of the different parts of the district has remained a theme throughout the preparation of the Core Strategy and is further developed in the Area Delivery Plan policies and in policy CS20 (Historic Environment and Landscape Character). The policy approach was subject to consultation through the 'Options for the Future' consultation (Preferred Policy approach CS17: Landscape Character referred, at bullet b to 'The retention of the individual identity of separate settlements').
- 5.8 A further key issue affecting this site is its impact upon the North Wessex Downs AONB which is a landscape of national importance. The northernmost part of the Pincents Hill site is within the AONB and the western edge is adjacent to the AONB. The main constraints to potential development, identified in the Landscape Sensitivity Study<sup>8</sup> are its visual impact and the loss of panoramic views which are enjoyed by the local residents. Extensive development would, both visually and physically, merge Tilehurst with Calcot. The recommendation was that though some development would be acceptable, the development would need to provide a buffer to the AONB, maintain landscaped links and better integrate the urban form into the landscape. The Council's landscape consultant advised on the outline planning application<sup>9</sup> that the proposed development would have a direct adverse impact on landscape and visual impact of part of the AONB and also on the setting of the AONB.

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<sup>8</sup> An Integrated landscape Sensitivity Approach to Settlement Expansion within West Berkshire, Kirkham Landscape Planning (May 2009) <http://www.westberks.gov.uk/index.aspx?articleid=16881>

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<sup>9</sup> [Report to Eastern Planning Committee – Special Meeting 2010-02-24](#)

- 5.9 The Phase 2 Transport Assessment work and the consideration of the planning application have highlighted a number of transport challenges for the area. These would need to be overcome in order to serve a possible development at Pincents Hill and the surrounding area. These challenges include: capacity issues along the A4 and at specific junctions; achieving a high level of public transport mode share; a high take up of travel plan measures; capacity issues at M4 Junction 12, and; land ownership and funding issues in relation to identified improvements. A number of transport schemes can be put forward for the area in order to provide the necessary infrastructure. Some of these could be facilitated through contributions from any potential development but contributions would not be significant enough to deliver all that is required.
- 5.10 The planning application was refused in February 2010 on several grounds, including the impact of the proposed development on the character of the gap between Theale and Tilehurst/Calcot, the adverse landscape and visual impact on the AONB and the cumulative adverse impact on road safety and the local transport infrastructure.
- 5.11 In conclusion, development at this location would pose considerable infrastructure issues and in wider policy terms would have an adverse impact in landscape terms on the North Wessex Downs AONB and its wider setting. It would also conflict with one of the themes of the Core Strategy which is to retain the individual identities of separate settlements.
- 5.12 **Whitehart Meadow Theale, Strategic Site**

Whitehart Meadow in Theale was promoted as a strategic site and tested as one of the options for accommodating development in the east of the district. It was clear from the outset that allocating a site of this scale (approximately 450 units) would have a considerable impact on Theale and could substantively change the role and function of Theale, which was being designated as a Rural Service Centre through the Core Strategy. The site is also in an area currently designated as a local gap, which performs an important local function in maintaining

the separate identities of Reading and Theale.

- 5.13 This option received multiple objections through the Options for the Future consultation. Much of the concern was about the in-combination impact of this development with the already committed, but unbuilt development of 350 units at Theale Lakeside.
- 5.14 Lakeside is a sizeable development for Theale and will add a considerable proportion to the dwelling stock of the area. Infrastructure, including services and facilities will need time to adjust to the increase in households and population. The Lakeside planning application, which was won on appeal, has already resulted in the need for the expansion of sixth form accommodation at Theale Green Community school and to the expansion of Theale Primary School. Both the primary and secondary schools have significant constraints both in terms of size and from both schools being on split sites. It has been concluded within the Infrastructure Delivery Plan that any further housing development at Theale would require significant capital investment and extensive remodelling or even re-build.
- 5.15 As the Lakeside development is committed, but not built, it is concluded that Theale will need a period of consolidation to ensure that the development is successfully integrated into the area and that the infrastructure and services are upgraded to accommodate this development. This means that Theale is not regarded as a suitable location for further strategic scale development within the Core Strategy period.
- 5.16 **Conclusion**

Allocating a strategic site in the east of the district would be likely to result in a number of negative impacts, including the coalescence of the separate identity of individual settlements and infrastructure issues. Both Options 1 and 2 proved very unpopular when tested through public consultation, and the outcome of public consultation is an important part of the evidence

base. There are specific and significant policy and technical issues affecting the allocation of either strategic site, as summarised above and set out in more detail within combined sites phase 1 and within the technical evidence base. The option of allocating a strategic site also attracted objections from the Highways Agency, on the basis of the proximity of strategic development to the Strategic Road Network, and from Reading Borough Council who raised concerns about the potential impact of a strategic site on infrastructure and communities in Reading.

- 5.17 There is no necessity to allocate a strategic site in terms of delivering the Core Strategy, and there are other approaches to providing housing in the eastern part of the District. Allocating a broad location identifies an area of search within which to allocate non-strategic sites through the Site Allocations and Delivery DPD.
- 5.18 One of the options tested was including the Rural Service Centres of Burghfield Common and Mortimer within a broad location to accommodate the growth requirements of the east. However, following Options for the Future, the District was divided into four spatial areas for the purpose of taking forward Area Delivery Plan policies for geographical areas of the district, setting out what the growth levels proposed would mean in terms of delivery on the ground. Burghfield Common and Mortimer were included within the East Kennet Valley as they relate better to the rural south-east of the District and the more dispersed pattern of development in this area. These settlements are less well related to Reading than Pangbourne and Theale, with poorer transport connections.
- 5.19 Defining the area of search to include the two Rural Service Centres of Pangbourne and Theale as well as the settlements within the Eastern Urban Area gives an opportunity to respond to issues of local housing need in the area which in terms of functionality is closely related to the Greater Reading area. This approach would support the growth of this area without causing significant infrastructure impacts. The scale of any proposed developments will respond positively to local character issues, and ensure that the separate identities of each of the

settlements is maintained in accordance with policy CS20 of the Core Strategy. The infrastructure requirements will be investigated comprehensively through the Infrastructure Delivery Plan which will be updated to form part of the supporting evidence to the Site Allocations and Delivery DPD and will ensure that the infrastructure requirements of the eastern area as a whole are effectively coordinated and delivered.

5.20 Up to 1,500 dwellings are expected to be developed within the broad location to 2026. At March 2009, 804 of those dwellings were either complete, or committed, leaving a requirement for approximately 690 additional homes. Sites have been identified through the preparation of the Strategic Housing Land Availability Assessment (SHLAA) to enable decisions on allocations through the Site Allocations and Delivery DPD to fulfil the residual housing requirement in this area to 2026

## **6.0 Approach to the Newbury/ Thatcham area**

- 6.1 As set out above, a ‘reserve’ site approach to future development was taken through the Options for the Future version of the Core Strategy. The reason for this was that the Council had made an early decision to look beyond 2026 in order to introduce the necessary flexibility and contingencies to the provision of housing development in the District and to manage the delivery of this provision. At this time, the evidence suggested that 3 sites around the Newbury/Thatcham area had potential for coming forward later in the Core Strategy period and should therefore be further assessed, using both additional technical work and the consultation process, to clarify which of these 3 sites would be the best option to take forward through the Core Strategy and when it should be delivered.
- 6.2 Concerns were raised about the “reserve” site approach, both during the consultation on Options for the Future and also by the Planning Task Group where discussions were held regarding the consultation exercise and the way forward for the Core Strategy. Views were expressed that to add the necessary certainty about the future location of development, a site should be clearly identified which could potentially carry on providing for the post 2026 period as well as within the Core Strategy period – therefore adding definition/ certainty for the public, developers and the delivery of infrastructure for the future direction of growth of the Newbury area. The site should also have the potential to come forward within the Core Strategy period if other sites did not deliver as expected.
- 6.3 The Council therefore decided not to pursue the term ‘reserve’ site in the Core Strategy as this was causing some confusion as to the intent of delivery. Instead it was decided to identify a further strategic site, in addition to the Newbury Racecourse site, to provide the necessary certainty and to help long-term planning of the District. The site or sites should be selected from the 3 reserve sites which could begin delivering development later on in the Core Strategy period (from 2016 onwards) but which had the capacity to continue to deliver, either after 2026 to provide long term flexibility, or before then if land supply monitoring showed that it was

necessary – or if the District’s housing requirement increased.

## 7.0 Focus on Newbury

7.1 At the Options for the Future stage of the Core Strategy, Newbury and Thatcham were still being treated as one area due to their geographical closeness and functional relationship. However, this was explored further through the consultation exercises and through discussions with Councillors and the ongoing assessment of the evidence base.

7.2 When looking at the references included within the South East Plan it is apparent that the references to a sub-regional hub as a focus for development and transport infrastructure are purely to the Newbury area rather than the wider Newbury/Thatcham area. Policy WCBV1: Core Strategy from the adopted South East Plan states that:

***“Sustainable Greenfield allocations should be mainly focused on the periphery of those hubs where other constraints do not prevent this – Basingstoke, Reading, Bracknell and Newbury – but smaller allocations may be brought forward at other settlements, subject to their meeting the same sustainability considerations. These urban extensions should minimise incursions into Green Belt or areas protected as AONBs or by other policies of regional, national and international importance”.***

Newbury and Thatcham are not a continuous urban area as the two towns are physically separated by countryside and part of the vision being taken forward within the Core Strategy is to retain that physical separation and maintain the distinctiveness of both towns. In addition Newbury and Thatcham have a differing form and character. Newbury is the administrative centre of the District and has a wide range of services and facilities. In contrast, Thatcham has more limited services and facilities available and the town centre is clearly in need of regeneration. Additionally there is a low employment base in Thatcham and educational pressures.

7.3 Thatcham has accommodated high rates of growth in recent times, with an average of 150 net completions a year since 2001 – an increase of nearly 15% in the dwelling stock of the town in



a short space of time. To reflect this, and to address concerns raised both through consultation and the work on the Thatcham Vision<sup>10</sup>, is considered that Thatcham should accommodate a more modest level of growth over the Core Strategy period and that the focus of any growth should instead be on regeneration and renewal to ensure that the facilities and services improve and that Thatcham can become a more self-contained market town. The need to develop services, infrastructure and facilities was expressed very strongly in all of the consultation exercises completed during the Thatcham vision project.

7.4 There is therefore an ‘in-principal’ reason for not taking forward the site at Siege Cross as a strategic site as Thatcham is not considered an appropriate location for a sustainable urban extension. Further information about this future role of Thatcham is set out within policy ADP3 of the Core Strategy which sets out a vision and delivery plan for the future of Thatcham which includes 900 dwellings (of which approximately two thirds had been completed at 31 March 2009), regeneration of the town centre and additional development to be allocated through the Site Allocations and Delivery Development Plan Document (DPD).

#### 7.5 **Newbury Racecourse**

Newbury Racecourse was included within Options for the Future as a preferred site for future development. During public consultation there were more supporting comments than objections to the proposed allocation of this site, largely due to the brownfield nature of the site and the access to the services of Newbury that developing this site would take advantage of. No new issues were raised which shed any doubt to the suitability of the site for inclusion within the Core Strategy and the site was confirmed as a strategic allocation within the

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<sup>10</sup> Thatcham Vision <http://thatchamonline.net/groups/thatcham-vision>

Proposed Submission Core Strategy. A planning application for the site was approved in January 2010, meaning that any mitigation measures, for example highways, had to take into account the agreed delivery of the Racecourse site.

## 7.6 **Additional Strategic Site**

Given the “in-principal” reason for not taking forward the site at Siege Cross as a strategic site as Thatcham is not considered an appropriate location for a sustainable urban extension, the remaining sites considered for the additional strategic site were Sandford Park and North Newbury. It was necessary to either look at the provision of a strategic site in addition to the preferred development at Newbury Racecourse –which could give the necessary flexibility and contingency to the provision of future development in the Newbury area. It therefore became a ‘choice’ between development at North Newbury, development at Sandford Park or potentially a combination of both.

## 7.7 **North Newbury**

As set out earlier in the topic paper it is acknowledged that certain “negative” factors raised in the sustainability appraisal can be overcome by the proper planning and provision of facilities within a strategic site, however as identified by the initial sustainability appraisal and more detailed assessment of the technical evidence base it is clear that there are a number of fundamental issues that affect North Newbury as a potential strategic site.

- 7.8 Firstly, in terms of connectivity and the provision of a cohesive urban extension, the site is divided by the A339 which is one of the major routes into Newbury which results in a very defined split through the site. This results in significant issues regarding connectivity and permeability through the site which cannot be resolved. Even with numerous bridges or underpasses across and under the A339 the sites will still be very much separated from one another and there will be no sense of place or identity between the two sites. The result would be the development of two distinct and separate parcels of land with little relationship to each

other. Either parcel of land cannot provide the proposed 2,000 dwellings without the other and as such both are required to meet the long term requirements of the Core Strategy. In terms of providing a sustainable urban extension to Newbury it is considered a split site divided by the A339 would not be an appropriate approach for the provision of a strategic site.

- 7.9 The North Newbury site also has significant flooding issues and this was drawn out through the sustainability appraisal. The area is identified on the Critical Drainage Area maps as being an area of “groundwater emergence” especially in proximity of the A339 and the B4009. A more detailed study, the West Berkshire Strategic Flood Risk Assessment (SFRA – level 2) February 2009 concludes that: “It is highly likely that there will be locations within the North Newbury Development Area that will be at high risk from surface run-off.” The SFRA level 2 also suggests that development is likely to be both susceptible to flooding and increase the flooding from the following sources: surface water runoff, groundwater and local drainage systems. Development of this area could also increase the risk of sewer and fluvial flooding elsewhere. The topography of the North Newbury site is characterised by hilly and undulating land, which contributes to the surface water run-off, which can result in the risk of localised flooding during heavy rainfall events. This risk was confirmed during July 2007 when intense rainfall caused significant surface flooding to the Vodafone HQ, which is situated below the proposed North Newbury site and adjacent the North Newbury site, which was affected by flowing water several centimetres deep.
- 7.10 The topography of the site also means that any development would be visually prominent to those entering or leaving the town from the north, with clear views across areas of the site which would need to be developed in order to achieve the housing numbers. This location is not seen against the backdrop of the existing urban area and as such would be viewed as new development within a countryside location which does not relate to the existing development pattern of the area. As such its development is likely to have a detrimental impact on this key ‘gateway’ to the town. The site would result in considerable landscape impact.

7.11 The area of the site with the least landscape impact is that to the west of the A339 adjacent to Donnington village, which despite its proximity to Newbury has retained its independent identity and integrity and separation from Newbury. The development of this part of the site for significant levels of housing would have a considerable impact on Donnington village and irreversibly alter its identity and integrity. Likewise the nearby historic environment and setting of Shaw House (a Grade 1 listed building) and Donnington Castle, would be significantly compromised by this level of development in such close proximity to them.

#### 7.12 **Sandleford Park**

A number of concerns have been raised through the consultation period regarding Sandleford Park being ranked last in the Sustainability Appraisal and the evidence not supporting its inclusion as a strategic site. As set out earlier in the topic paper it is acknowledged that certain “negative” factors raised in the sustainability appraisal can be overcome through appropriate mitigation and by the sites potential to provide improved facilities. The key objections raised regarding Sandleford were based on the initial sustainability appraisal, the landscape reports undertaken by Kirkham Landscape Planning Ltd on behalf of the Council, Highways issues and the content of the previous Local Plan Inspector’s Report regarding Sandleford during consideration of the Newbury District Local Plan 1991 - 2006.

7.13 As set out in Section 2, the initial sustainability appraisal was undertaken based on a broad red edge and assumed that the centre point of the site would be the focus of development. Sandleford Park is one of the few sites where the landowners/agents have consulted with the public, held public exhibitions and have proposed a land use plan. The land use plan submitted as part of the Sandleford Park representations shows the residential development is proposed to the north and western areas of the site, which are closely related to the Newbury Rugby club site. The location of development proposed in this location, with the southern fields provided as open space/ country park, would significantly alter the scoring of Sandleford Park and result in it scoring positively.

- 7.14 If the sustainability appraisal were undertaken on a more detailed basis, there would understandably be validation issues due to the fact that different sites being considered on different levels of information. Therefore given for the need for the sustainability appraisal to fairly compare all the sites, the rescoring of the sustainability appraisal has not been undertaken and has been based on the high level red edge and based around a mid point. It is therefore necessary and appropriate for the Council to assess and interpret not only the sustainability appraisal and technical evidence base but the information submitted alongside these documents as part of the consultation events, to enable a sound, credible and robust decision to be made.
- 7.15 With regards to the landscape of Sandleford Park, when assessed as a broad red edge with a presumption for development to occur centralised around a mid point, as per the parameters of the evidence base, then it becomes apparent that development would need to occur on the fields to the south of the site and this would result in landscape impact. However, the proposals and approach being put forward at Sandleford Park and the incorporation of the green infrastructure into the master plan would have a fundamental effect on how the development site would be viewed and perceived. Adverse visual impacts could be mitigated with the development being located in the north-western and western parts of the site, thereby retaining the open landscape setting of the southern part of the site and the retention of the mature woodland. Therefore with careful planning of the site the issue can be fully mitigated and the landscape setting restored and retained.
- 7.16 Highways and traffic are an issue for any strategic site, and the issues associated with Sandleford are no different to any site in terms of traffic generation, highways improvements and mitigation. Given the nature of the site and the number of dwellings proposed the highways issues are resolvable and can be fully mitigated as part of the development of the Sandleford Park site. With regards to the sustainability of the site as assessed by WSP as part of the Transport Assessment undertaken for West Berkshire Council, Sandleford Park was again considered on the basis of the whole red edge of the site, and on the basis of providing

2500 dwellings. This has resulted in it being ranked as mid to lower in terms of sustainability when assessing the sites across the district. However, one of the sites assessed was Newbury Rugby Club, which scored as the fourth most sustainable location for development, and more sustainable than the North Newbury site. The proposed land use plan, submitted as part of the Sandford Park representations, identifies the majority of the residential development being adjacent to the east and south of Newbury Rugby Club and therefore it would appear more appropriate that the scoring of the proposed development is more akin to the scoring given to the Newbury Rugby site, rather than the scoring based on the centre point of the whole Sandford Park site.

- 7.17 With regard to the previous Local Plan Inquiry in 1999, at this time, Sandford had been included within the Local Plan as a proposed site for future development. The Inspector, however, disagreed with the Council and recommended the removal of Sandford from the Local Plan.
- 7.18 Some objectors have taken the view that this means that the site remains unsuitable for future development. However, since the Inspector's report of 11 years ago, the site being promoted for development is significantly different and additionally the context of the site has changed and become increasingly urbanised with the development of Newbury College, the Household Waste and Recycling Centre and the further development of Newbury Retail Park including the Tesco superstore.
- 7.19 The previous Local Plan Inspector concluded in his report (dated December 1999) that the development of Sandford Park would have detrimental impacts on the character of the countryside which would outweigh its development potential, as well as impacts on the setting of Sandford Priory. He stated that Sandford Park is open and prominent from several aspects and is appreciated by many "*seeing it, passing by it or walking through it*" and the proximity of housing would harm the Area of Special Landscape Importance. However it is important to set out at this point that the development proposed in 1999 was significantly

different to the proposed development being promoted this time around. The previous concept was a stand alone village with a “cordon sanitaire” separating it from the built up area of Newbury. The development was very prominent in the southern fields of the site and development was proposed opposite the Sandleford Priory site with access taken, via a roundabout, off the A339 opposite Sandleford Priory. The result of this development was that it would have had a significant impact on the landscape setting on the approach to Newbury and also would significantly change the setting and context of the former Sandleford Priory. The Inspector was concerned about the visual appearance of the developed site on Newbury and he was principally concerned with the site’s role as an open entrance to the town; particularly associated with the impacts of the development on passers-by, principally on the A339. On this basis the Inspector was not wrong in his conclusions when assessing the scheme being proposed.

7.20 The site currently being promoted has been designed from the outset to fully address the Inspectors previous concerns and is envisaged to be developed in a comprehensive manner to ensure that the maximum potential can be derived, with an overall master plan to protect matters of importance. It is proposed to direct development towards land which is well related to the existing built up area of Newbury to the north (towards Monks Lane) and west of the site (towards Wash Common). The importance of the open views across the valley are recognised and as such views from the A339 and Sandleford Priory will be retained, with public open space/ country park created to retain the openness of this area and public access in perpetuity. This will respect the site as a “gateway” to Newbury and retain the attractive open landscape to the south. The siting of development to the north would ensure that it relates well to development along Monks Lane to the north and towards Wash Common to the west. The development will be set between the pockets of the retained ancient woodland which will ensure the site is developed alongside the existing green infrastructure in a sympathetic manner. Furthermore by directing development to the northern section of the site, the sustainability of the development is improved, with the development being well related to the existing built up area and facilities such as schools, shops and healthcare facilities whilst also being in close proximity to the town centre to enable access to more varied facilities, service, leisure uses and employment opportunities.

7.21 As such the scheme being promoted on Sandford Park fully addresses the previous inspectors concerns and continues to protect the wooded areas to the south of the site which were considered as being of appropriate landscape quality to be designated as an Area of Special Landscape Importance. As development is proposed to be directed away from these areas this will ensure its long term protection. Likewise by maintaining the open views across the site and concentrating development in locations that are well related to the existing built-up area, this fully addresses and overcomes the previous Local Plan Inspector's comments and maintains and retains the character of the landscape and provides a highly sustainable urban extension which fully justifies Sandford Parks inclusion as a strategic site within the West Berkshire Proposed Submission Core Strategy.



## Appendix A – Sandford Park and North Newbury sustainability tables and commentary

### Sustainability Appraisal Scoring

#### Sandford Park, Newbury

SA Sub-Objective	Ranking	Score	Comments	
<b>1. To provide sufficient good quality housing to meet identified local needs</b>				
1a	To meet the demand for affordable housing both in quantity and type available	H	3	The development of up to 2,000 homes at Sandford Park will enable a minimum level of 30% affordable housing
1b	To promote the adoption of sustainable design and construction practices in housing	L	0	Development at Sandford Park will be able to deliver housing that is constructed to integrate sustainable construction measures/ practices
<b>2. To improve health and well being and reduce inequalities</b>				

2a	To support healthy, active lifestyles	M	0	<p>The Sandleford Park site is not located within one of the top 10 deprived areas within West Berkshire.</p> <p>The Sandleford Park site is not located within close proximity to AWE Aldermaston, AWE Burghfield or Padworth Depot</p>
2b	To reduce levels and fear of crime and anti-social behaviour	M	0	The masterplan for Sandleford Park will be able to integrate crime prevention measures
2c	To improve access to the countryside, parks, open space, formal play facilities and libraries	M	4	The Sandleford Park site is located within close proximity to at least 2 community facilities
<b>3. To improve and safeguard accessibility</b>				
3a	To improve access to education, employment and services	H	-1	The Sandleford Park site is located in close proximity to existing primary and secondary schools and adjacent to Newbury College.

				<p>The development of up to 2,000 homes at Sandlesford Park will be able to provide land for a new primary school and for improvements at Park House School.</p>
				<p>The Sandlesford Park site is accessible to Newbury town centre by public transport, with access to employment. The development of up to 2,000 homes will also enable a public transport route to be provided.</p>
3b	To improve access to the countryside, parks and open space	M	-4	<p>Although the identified site area at Sandlesford Park site includes current open land/ countryside, this does not have public access except for a footpath.</p>
				<p>The wider identified site at Sandlesford Park will not be required in it's entirety for development. This area will enable the provision of a large country park/ public open space and play facilities to be provided to enhance public access and protect the countryside in perpetuity.</p>
3c	To support the development of access to IT facilities including broadband particularly in rural areas	L	1	<p>Sandlesford Park will enable the provision of appropriate network connections for broadband facilities</p>
<p><b>4. To achieve and promote high level provision and use of sustainable transport modes where</b></p>				

<b>possible</b>				
4a	To reduce the need for people to travel, especially by car	H	-6	<p>Although the wider site area at Sandlesford Park is located more than 20 minutes from the town centre, development will be located towards the north and west of the site, which is within 20 minutes of the town centre.</p> <p>The Sandlesford Park site is located within 0-10 minutes of a local centre.</p>
4b	To reduce accidents and improve safety	M	0	The development of 2,000 homes at Sandlesford Park will enable highway safety measures to be included
4c	To increase opportunities for walking, cycling and use of public transport and ensure the necessary infrastructure is available	H	4	The Sandlesford Park site is located within 100m of a designated cycle route. The site is also proximate to a frequent and regular bus route to the town centre. The development of up to 2,000 homes will also enable an improved bus routes to be provided.
<b>5. Contribute to good governance</b>				
5a	To improve opportunities for participation in local action and decision	M	0	The Sandlesford Park site proposals provides the opportunities for local residents, Parish Council, Town Council and other third parties to be involved in the

	making			masterplanning process to ensure that any proposals respond to local needs
<b>6. Ensure that the natural, built and historic environment is conserved and enhanced</b>				
6a	To conserve and enhance the biodiversity and geodiversity of West Berkshire	H	-3	<p>Although the wider red line boundary of Sandlesford Park is within 500m of the Greenham Common SSSI the developable part of the site is located more than 750m from the SSSI.</p> <p>Although the site contains ecological features and ancient woodland these can be protected on site within the Country Park or retained as features within the site.</p>
6b	To conserve and enhance the character of the landscape	H	-2	Development at Sandlesford Park will be concentrated towards the less sensitive land to the north and west. The more sensitive and open landscape to the south and east of the site and views across this area from the A339 will be retained through provision of the Country Park
6c	To protect, conserve and enhance the built, cultural and historic environment	H	-6	The Sandlesford Park site does not contain any features of historic importance; however the Sandlesford Priory is a Grade I listed building and the walled garden to the east is a registered park and garden.

				The retention of the open landscape to the south and east of the site and provision of the country park will ensure that development does not impact upon the Grade I listed building. The walled garden is in a degraded state and development will not affect this.
<b>7. To protect and improve air, water and soil quality, and minimise noise levels through West Berkshire</b>				
7a	To reduce air pollution	H	0	The Sandleford Park is not located within an AQMA or area of poor air quality
7b	To reduce noise levels in main settlements	L	0	The site is not located within a noisy area and the location of the development to the north and west of the site, away from the A339, will ensure that traffic noise impacts will be minimised
7c	To maintain and improve soil quality	M	0	The Sandleford Park site is grade 3 agricultural land. However as a significant proportion of land will be retained to provide the Country Park this will be available for agriculture if needed
7d	To maintain and improve water quality	M	0	The Sandleford Park is not located within a flood risk area and appropriate SUDS can be integrated at a

				design stage
<b>8. To improve the efficiency of land use</b>				
8a	To maximise the use of previously developed land and buildings where appropriate	M	-2	The Sandlesford Park is a greenfield site. However there is not sufficient, available and deliverable previously developed land within the district to provide the necessary 2,000 homes
<b>9. To reduce consumption of natural resources and manage their use efficiently</b>				
9a	To reduce energy use and promote the development and use of sustainable/renewable energy technologies	H	0	The Sandlesford Park site can accommodate a sufficient quantum of development for de-centralised energy generation and individual renewable energy sources on dwellings
9b	To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	M	0	The Sandlesford Park site will enable appropriate waste systems to be implemented

9c	To reduce water consumption and promote reuse	H	0	The Sandleford Park site will enable appropriate water saving measures to be implemented e.g. rainwater harvesting and grey water reuse
9d	To reduce consumption of minerals and promote reuse of secondary materials	M	-2	Although the Sandleford Park site is on a potential mineral reserve site, the extent of this and feasibility for extraction can be investigated. If appropriate minerals can be extracted prior to development
<b>10. To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change</b>				
10a	To reduce West Berkshire's contribution to greenhouse gas emissions	H	0	The Sandleford Park site can include measures to reduce emission rates
10b	To sustainably manage flood risk to people, property and the environment	H	0	The site is not within flood risk area 2 and 3 or a critical drainage area
<b>11. To maintain a strong, diverse and sustainable economic base</b>				



11a	To provide a range of high quality employment opportunities	H	0	The Sandlesford Park site is of a sufficient size to accommodate some employment opportunities, if deemed appropriate
11b	To promote and support key business sectors and utilise employment land effectively and efficiently	H	0	
11c	To increase the viability and vitality of commercial centres	M	0	

**Sustainability Appraisal Scoring**

**North Newbury**

SA Sub-Objective	Ranking	Score	Comments	
<b>1. To provide sufficient good quality housing to meet identified local needs</b>				
1a	To meet the demand for affordable housing both in quantity and type available	H	3	Development at North Newbury will enable a minimum level of 30% affordable housing
1b	To promote the adoption of sustainable design and construction practices in housing	L	0	Development at North Newbury will be able to deliver housing that is constructed to integrate sustainable construction measures/ practices
<b>2. To improve health and well being and reduce inequalities</b>				
2a	To support healthy, active lifestyles	M	0	The North Newbury site is not located within one of the top 10 deprived areas within West Berkshire.

				The North Newbury site is not located within close proximity to AWE Aldermaston, AWE Burghfield or Padworth Depot
2b	To reduce levels and fear of crime and anti-social behaviour	M	0	The masterplan for North Newbury will be able to integrate crime prevention measures
2c	To improve access to the countryside, parks, open space, formal play facilities and libraries	M	4	The North Newbury site is located within close proximity to at least 2 community facilities
<b>3. To improve and safeguard accessibility</b>				
3a	To improve access to education, employment and services	H	-3	There is not sufficient capacity within local schools to accommodate strategic development.
				The development may be able to provide land for a new primary school.
				The North Newbury site is accessible to Newbury town centre by public transport, with access to employment. The development of up to 2,000 homes will enable a

				public transport route to be provided.
3b	To improve access to the countryside, parks and open space	M	4	The identified site area at North Newbury includes open land/ countryside, but doesn't have public access. It is however located within 400m of an area of public open space. The site will also enable additional open space to be provided.
3c	To support the development of access to IT facilities including broadband particularly in rural areas	L	2	North Newbury will enable the provision of appropriate network connections for broadband facilities
<p><b>4. To achieve and promote high level provision and use of sustainable transport modes where possible</b></p>				
4a	To reduce the need for people to travel, especially by car	H	3	The site is located within 10-20 minutes of the town centre and 0-10 minutes of a local centre.
4b	To reduce accidents and improve safety	M	0	The development of 2,000 homes at North Newbury will enable highway safety measures to be included
4c	To increase opportunities for walking, cycling and	H	0	The North Newbury site is well located in terms of access to the town centre by cycle. However the site is

	use of public transport and ensure the necessary infrastructure is available			very poorly served in terms of public transport access.
<b>5. Contribute to good governance</b>				
5a	To improve opportunities for participation in local action and decision making	M	0	The North Newbury site proposals provides the opportunities for local residents, Parish Council, Town Council and other third parties to be involved in the masterplanning process to ensure that any proposals respond to local needs
<b>6. Ensure that the natural, built and historic environment is conserved and enhanced</b>				
6a	To conserve and enhance the biodiversity and geodiversity of West Berkshire	H	-3	<p>The site is located approximately 500m from the River Lambourn Site of Special Scientific Interest (SSSI) and the Kennet and Lambourn Floodplain Special Area of Conservation (SAC).</p> <p>There are two wildlife heritage sites located north of the site.</p>

6b	To conserve and enhance the character of the landscape	H	-2	<p>The North Newbury site has a sensitive and open landscape. The land west of the A339 is important in maintaining the separation of Donnington village and Newbury. Development will lead to the coalescence of these settlements.</p> <p>The sloping land east of the A339 has an open appearance; as such development will be visible from the surrounding area.</p>
6c	To protect, conserve and enhance the built, cultural and historic environment	H	0	The North Newbury site does not contain any features of historic importance; however there is a registered park and garden situated to the south and west.
<p><b>7. To protect and improve air, water and soil quality, and minimise noise levels through West Berkshire</b></p>				
7a	To reduce air pollution	H	0	The North Newbury is not located within an AQMA or area of poor air quality
7b	To reduce noise levels in main settlements	L	0	The site is bisected by the A339 and as such there are noise impacts associated with vehicle movements. Development could however be buffered alongside this road.

7c	To maintain and improve soil quality	M	-4	The North Newbury site is grade 2 agricultural land. Part of the site contains an area of landfill
7d	To maintain and improve water quality	M	0	<p>The North Newbury site has significant flooding issues. The site is identified as an area of 'groundwater emergence' in the proximity of the A339 and the B4009 in the Level 1 Strategic Flood Risk Assessment. The Strategic Flood Risk Assessment (Level 2, January 2009) suggests that development is likely to be (without mitigation) both susceptible to flooding and increase the flooding from the following sources: surface water runoff, groundwater and local drainage systems.</p> <p>Development of this area could also increase the risk of sewer and fluvial flooding elsewhere.</p> <p>Any development would require significant mitigation for flood risk and investigation regarding the feasibility of SUDS.</p>
<b>8. To improve the efficiency of land use</b>				
8a	To maximise the use of previously developed land and buildings where appropriate	M	-2	The North Newbury is a greenfield site. However there is not sufficient, available and deliverable previously developed land within the district to provide the necessary 2,000 homes
<b>9. To reduce consumption of natural resources and manage their use efficiently</b>				
9a	To reduce energy use and promote the development	H	0	The North Newbury site can accommodate a sufficient quantum of development for de-centralised energy

	and use of sustainable/renewable energy technologies			generation and individual renewable energy sources on dwellings
9b	To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	M	0	The North Newbury site will enable appropriate waste systems to be implemented
9c	To reduce water consumption and promote reuse	H	0	The North Newbury site will enable appropriate water saving measures to be implemented e.g. rainwater harvesting and grey water reuse
9d	To reduce consumption of minerals and promote reuse of secondary materials	M	0	The North Newbury site is not identified as a potential minerals site
<b>10. To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change</b>				
10a	To reduce West Berkshire's contribution to greenhouse gas emissions	H	0	The North Newbury site can include measures to reduce emission rates



10b	To sustainably manage flood risk to people, property and the environment	H	0	The site is not within flood risk area 2 and 3 or a critical drainage area. However the strategic flood risk assessment has identified a significant drainage issue associated with groundwater emergence.
<b>11. To maintain a strong, diverse and sustainable economic base</b>				
11a	To provide a range of high quality employment opportunities	H	0	The North Newbury site is of a sufficient size to accommodate some employment opportunities, if deemed appropriate
11b	To promote and support key business sectors and utilise employment land effectively and efficiently	H	0	
11c	To increase the viability and vitality of commercial centres	M	0	

West Berkshire Council

Combined Strategic Housing Sites Appraisal Document Phase 2