


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector
- All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>

	Your details	Agent's details (if applicable)
Title:	Mr	Mrs
First Name:*	Matt	Michelle
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Job title <i>(where relevant):</i>	Strategic Land Director	Director
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*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Michelle Quan, Boyer Planning obo Sovereign
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Whole Document
Policy:	
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

<p><i>Please refer to the accompanying submitted representations.</i></p>

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the accompanying submitted representations.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review


Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature		Date	02/03/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



West Berkshire Local Plan Review (2022 – 2039)

Regulation 19 Consultation 2023

Boyer

Report Control

Project:	Land adjoining The Haven, Kintbury, West Berkshire
Client:	Sovereign
Reference:	23.1003
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Primary Author	Daniel Nunn ('DN')
Checked By:	Michelle Quan ('MQ')

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
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02	02/03/2023	Final	MQ

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APPENDICES

Appendix 1 – Site Location

Appendix 2 – Site Access Technical Note

1. EXECUTIVE SUMMARY

- 1.1 Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. Boyer have prepared these representations on behalf of Sovereign, in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039).
- 1.2 The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness. To this end, general support is provided to the spatial strategy set out in the West Berkshire Local Plan Review (2022 – 2039), to the Council's conduct of the plan-making process in relation to the Duty-to-Cooperate, and specifically for the allocation of Land Adjoining The Haven, Kintbury, for residential development.
- 1.3 The Proposed Submission West Berkshire Local Plan (2022 – 2039) ('emerging local plan') proposes to allocate a series of sites to, as a minimum, meet the identified housing needs within the district. Despite the constrained nature of the district, the plan identifies a robust selection of sites that are capable of delivering residential development appropriate to accommodate sustainable growth to meet the minimum local housing need of the area.
- 1.4 Sovereign **supports** this approach, recognising that the Council's commitment to accommodate the identified minimum Local Housing Need ('LHN') figure within the district is paramount.
- 1.5 The Council's identification of sufficient developable land to deliver approximately 5% additional homes above the minimum identified need is also **supported**. Sovereign considers that this 5% 'headroom' provides for a flexible and robust quantum of housing supply to fully ensure that the identified housing needs of the district are met.
- 1.6 Furthermore, the identified headroom in the housing supply could usefully accommodate a proportion of the unmet need that is likely to arise from Reading, as part of the Western Berkshire Housing Market Area ('HMA'). Sovereign **supports** the Council in seeking to accommodate a reasonable proportion of this unmet need and recommends that the Council seek to maximise the delivery of new homes on the proposed site allocations to assist in delivering this aim. Such an approach would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing, ensuring minimum housing needs are met.
- 1.7 In seeking to deliver the amount of new homes required in the district, the Council have identified an appropriate spatial strategy. The emerging local plan recognises that there is limited further growth potential at the district's most sustainable settlements; namely, Newbury and Thatcham, alongside the Eastern Urban Area, whilst maximising the available land within the relevant site allocations. Sovereign **supports** the Council's identification of a spatial strategy which directs development to available land within the next most sustainable locations as appropriate, in accordance with the settlement hierarchy.

- 1.8 The otherwise relatively unconstrained nature of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB'), in combination with the presence of a series of sustainable medium and smaller-sized Service Villages, provides that the North Wessex Downs AONB Spatial Area (as identified in proposed Policy SP1) remains appropriate to accommodate a reasonable proportion of the district's identified housing needs.
- 1.9 To maintain the longer-term vitality of the district's Service Villages, such as Kintbury, it is imperative that the Council supports the sustainable growth of these areas, supporting the viability of local services and amenities, alongside delivering much-needed affordable housing in rural areas. To this end, Sovereign **supports** the identification of specific site allocations within these villages, which provide opportunities for modest sustainable growth whilst conserving and enhancing the special landscape qualities of the AONB.
- 1.10 Sovereign therefore **supports** the identification of Land Adjoining The Haven, Kintbury ('the site') as being suitable for allocation within the emerging local plan, through proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'. Kintbury comprises a relatively unconstrained settlement that can accommodate sustainable growth during the plan period. The site is well-positioned to make a reasonable contribution to meeting the district's development needs.
- 1.11 The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities provided in the village, benefitting from good access to nearby main settlements including Newbury (by bus and rail), Reading, and London Paddington (by rail). There are not considered to be any significant constraints to the development of the site, which could provide at the very least a minimum of 20 high-quality new homes.
- 1.12 Sovereign is able to confirm that the site is *available* for development now, offers a *suitable* location for residential development, and is *achievable* with a realistic prospect that housing can be delivered on-site within the first five years of the proposed plan period. Consequently, the site should be considered favourably in relation to planning practice guidance and its proposed allocation within the emerging West Berkshire Local Plan is **supported**.
- 1.13 Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant and is capable of being found Sound following independent Examination. Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

2. INTRODUCTION

Context

- 2.1 Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at **Appendix 1: Site Location Plan**.
- 2.2 Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.
- 2.3 The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.
- 2.4 The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:
 - a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
 - b) **Justified** – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
 - c) **Effective** – deliverable over the plan period and based on effective joint working.
 - d) **Consistent with national policy** – enabling the delivery of sustainable development.
- 2.5 At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.
- 2.6 These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

- 2.7 The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.
- 2.8 To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.
- 2.9 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the ‘Regulation 19’ consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.
- 2.10 Sovereign **supports** the Council’s commitment to review the existing development plan through this process.

Land adjoining The Haven, Kintbury (‘the site’)

- 2.11 Land adjoining The Haven, Kintbury, comprises approximately 1.5 hectares of land toward the south-western extent of Kintbury village. The site lies to the rear of existing residential properties, which front onto the road known as ‘The Haven’. The site currently comprises an undeveloped open field, bordered by dense hedgerows with intermittent tree cover.
- 2.12 To the north of the site lies the Kintbury Rangers Football Club, which includes a range of sports facilities alongside the Jubilee Centre, a community sports building. Beyond the well-vegetated site boundaries to the south and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.
- 2.13 West Berkshire District Council assessed the site within the district’s Housing and Economic Land Availability Assessment (‘HELAA’)¹, under Site Reference: KIN6. The HELAA, which was first published in February 2020 and subsequently updated (most recently in January 2023), concluded that the site was *potentially available*, *potentially suitable*, and *achievable* for residential development within the proposed emerging plan period.

¹ Available online at: <https://westberks.gov.uk/helaa>.

- 2.14 Sovereign **supports** the conclusion that residential development would be *achievable* on the site within the emerging plan period. However, Sovereign considers that the site is also immediately *available* for development and is *suitable* for residential development within the proposed emerging plan period in relation to the provisions set out in Planning Practice Guidance². Further detail is provided in Section 6 of these representations in relation to the *availability, suitability, and achievability* of the site for residential development.
- 2.15 As section 5 of these representations illuminates, the site benefits from being sustainably located and there are not considered to be any significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.
- 2.16 The development of the site for a minimum of 20 new homes would contribute toward meeting the district's significant identified housing need in a sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, and financial contributions toward the maintenance of local infrastructure.
- 2.17 Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. As such, the allocation of the site for a minimum of 20 dwellings, which provides scope for additional dwellings to be provided above the identified quantum, would accord with Paragraph 124 of the NPPF, in which it is made clear that '*planning policies and decisions should support development that makes efficient use of land*'.
- 2.18 Consequently, Sovereign **supports** the proposed allocation of the site for residential development in the emerging local plan. Furthermore, Sovereign considers that, with sensitive design, the site could accommodate a higher number of new homes, that would go towards meeting the district's identified housing needs. As such, Sovereign recommends that the proposed allocation is amended to reflect this approximate capacity to reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

² PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018-20190722.

3. THE SCALE OF HOUSING NEED

3.1 This section details Sovereign's position with regard to the scale of housing need within West Berkshire. In determining the appropriate Housing Requirement for the emerging West Berkshire Local Plan (2022 – 2039), the discussion considers three key themes:

- a) the scale of housing need within West Berkshire;
- b) unmet need arising outside of West Berkshire & the Duty-to-Cooperate; and
- c) the need for affordable housing in West Berkshire.

Calculating Housing Need

3.2 In considering the appropriate housing requirement for the district, the supporting text accompanying emerging Policy SP12: 'Approach to Housing Delivery' identifies that the strategic policies contained within the emerging local plan should be informed by an assessment of Local Housing Need ('LHN').

3.3 The National Planning Policy Framework ('NPPF')³ confirms, at paragraph 61, 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".

3.4 The Government's Standard Method for calculating housing need is set out clearly in Planning Practice Guidance ('PPG')⁴. Proposed Policy SP12 clarifies that the appropriate LHN figure for West Berkshire comprises 513 dwellings per annum ('dpa), derived using the Government's Standard Method. No exceptional circumstances have been identified that apply to West Berkshire which justify the use of an alternative approach to the government's Standard Method. We do not consider that there are any, particularly given the high bar that this test requires, and that the Standard Method represents the appropriate basis for calculating the District's housing need.

3.5 Sovereign **supports** the Council's use of the Government's Standard Method to derive an appropriate housing need figure for the district area. However, as noted within the emerging local plan, it remains an important consideration that the LHN figure represents the minimum identified housing need for the district and should not be considered to represent a maximum quantum of development to be provided.

³ Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

⁴ Available online at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing>.

- 3.6 PPG clarifies that there are various circumstances in which it may be appropriate for an authority to plan for a higher number of homes than indicated through the LHN calculation. Such circumstances include, but are not limited to, situations in which an authority has agreed “to take on unmet need from neighbouring authorities, as set out in a statement of common ground”⁵.
- 3.7 Furthermore, it is considered to be prudent for local authorities to identify a quantum of supply that provides sufficient flexibility to ensure that the housing requirement would be delivered in practice. Typically, this is reflected in the provision of an amount of headroom in the supply over the minimum target, to account for potential market conditions that may cause some of the identified development sites to be delayed or wholly inhibited from coming forward throughout the plan period.
- 3.8 To this end, the Council has identified an approach to housing need that reflects a range, between the LHN minimum of 513 dpa to 538 dpa. Sovereign **supports** the Council’s approach. The identification of an appropriate housing target that is approximately 5% above the LHN minimum figure is considered to be sufficiently robust, as this is considered to assist in ensuring that the identified supply meet, at least, the district’s minimum housing needs.

Unmet Need Arising Outside of West Berkshire & the Duty-to-Cooperate

Unmet Need Arising Outside of West Berkshire

- 3.9 Notably, the Government’s Standard Method calculation does not take account of unmet need arising from outside of the authority’s area. However, as noted within the emerging local plan, West Berkshire district falls within the Western Berkshire Housing Market Area (‘HMA’), which also comprises Bracknell Forest Council, Reading Borough Council, and Wokingham Borough Council.
- 3.10 The Berkshire (including South Bucks) Strategic Housing Market Assessment (‘SHMA’) (2016)⁶, published as part of the Council’s evidence base, affirms the strong functional relationships exhibited between these local authority areas, in relation to where people live and work.
- 3.11 Recognising these functional relationships, the Western Berkshire HMA authorities have demonstrated a shared history of collaborative working in relation to housing matters and associated infrastructure, which included the preparation of a joint Statement of Common Ground (‘SoCG’) for the purposes of local plan-making.

⁵ *Ibid.* PPG Paragraph: 010 Reference ID: 2a-010-20201216.

⁶ Available online at: https://www.westberks.gov.uk/media/40949/Berkshire-inc-South-Bucks-Strategic-Housing-Market-Assessment/pdf/Berks_SHMA_Feb_2016.pdf?m=638103405174070000.

- 3.12 Signed by each constituent authority in August 2021, the West of Berkshire Area SoCG⁷ recognises that, in the first instance, each authority will seek to meet its own development needs in full. However, the SoCG acknowledges that there is a shortfall in planned residential development in Reading borough of 10 dpa, equating to 230 net new homes over the adopted plan period.
- 3.13 Consequently, it is recognised that there is currently a modest identified quantum of unmet need arising from within the Western Berkshire HMA. In seeking to address this unmet need, the SoCG recognises that this should, in principle, be met within the Western Berkshire area.
- 3.14 As such, Sovereign **supports** the Council's identification of additional headroom within the identified supply, which could be partially utilised to accommodate an appropriate proportion of the unmet need arising from Reading borough throughout the plan period.
- 3.15 In providing sufficient capacity within the headroom of supply in West Berkshire, Sovereign recommends that the Council seeks to maximise the development potential of the sites proposed to be allocated for residential development within the plan.
- 3.16 To this end, Sovereign recommends that the identified approximate capacity within proposed Policy RSA23: 'Land Adjoining The Haven, Kintbury' be revised to approximately 35 dwellings. As set out in Section 6 of these representations, the site is considered to be capable of delivering this quantum of development whilst being sensitively designed to conserve and enhance the special landscape character of the AONB.
- 3.17 Given that the identified unmet need arising within Reading is anticipated within the latter stages of the borough's adopted plan period, alongside the borough's commitment to review the adopted local plan by 2024, it is considered that the long term extent of unmet need arising from Reading remains unclear. Sovereign therefore **supports** the Council's identification of headroom within the supply, whilst not explicitly identifying a quantum of homes that specifically relate to providing for unmet need in Reading.

The Duty-to-Cooperate

- 3.18 Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.

⁷ Available online at: [https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR Interim DtC Statement January 2023.pdf?m=638086137283470000](https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR%20Interim%20DtC%20Statement%20January%202023.pdf?m=638086137283470000).

- 3.19 Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.
- 3.20 Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is *positively prepared* and the product of an *effective* and robust process of cooperation between the authorities.
- 3.21 Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making process.

Affordable Housing Need in West Berkshire

- 3.22 West Berkshire faces a significant need for affordable housing over the plan period, as affirmed within the emerging local plan. The conclusions of the Berkshire (including South Bucks) SHMA (2016), updated in 2022⁸, further demonstrate the extent of this need in the plan area, finding that there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.
- 3.23 The identified need for affordable homes in West Berkshire, of 330 dwellings per annum, comprises approximately 64% of the overall identified housing need for the plan area, of 513 dwellings per annum. To deliver the number of affordable homes that are needed in West Berkshire, the plan would be required to identify a housing supply of, at least, 825 dwellings per annum (assuming a policy requirement of 40% affordable housing provision is applied), which represents +160% of the LHN figure.
- 3.24 Given that the identified annual need for affordable housing provision comprises approximately 64% of the overall annual local housing need, there is a clear case for accommodating further residential development, as far as is reasonably practicable, within the district to promote the delivery of greater affordable housing.
- 3.25 Furthermore, the Updated Housing Needs Evidence (2022)⁹ illustrates, at Table 4.15, that a significant proportion (approximately 46%) of the district's total affordable housing need is required within the North Wessex Downs AONB Spatial Area, comprising 152 dpa out of the overall total of 330 dpa.

⁸ Available online at: https://www.westberks.gov.uk/media/49801/Updated-Housing-Needs-Evidence-July-2022/pdf/West_Berkshire_Housing_Needs_Assessment_Update_July_2022.pdf?m=638006715718270000.

⁹ *Ibid.*

- 3.26 ONS datasets¹⁰ confirm that the latest median housing affordability ratio (2021) for West Berkshire is 9.73¹¹. This means that the median house prices in the district are almost 10 times that of median workplace-based earnings. This is up from a ratio of 5.1 in 2000 and 7.3 in 2010, which indicates that homes in West Berkshire have become markedly less affordable over time.
- 3.27 To support the long-term viability of services and amenities of the district's numerous Service Villages within the North Wessex Downs AONB Spatial Area, such as Kintbury, there is clearly a need to deliver new market and affordable homes in the village within the plan period. Sovereign therefore **supports** the allocation of Land Adjoining The Haven, which presents the most suitable opportunity in Kintbury to provide much-needed new homes.

¹⁰ Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS.

¹¹ Median housing affordability ratio refers to the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers.

4. THE SPATIAL DISTRIBUTION OF HOUSING

- 4.1 The NPPF (2021) requires, at paragraph 20, that strategic policies should set out an overall strategy for the pattern, scale, and design quality of places, making sufficient provision for housing and other development needs. Sovereign welcomes the Councils' consideration of alternative options¹² to develop an appropriate spatial strategy for West Berkshire up to 2039, as detailed within the Sustainability Appraisal.
- 4.2 The identified alternative spatial strategy options for the district each seek to direct development toward the most sustainable settlement locations within West Berkshire. Sovereign **supports** the Council's commitment to maximising development at the most sustainable locations in the district.
- 4.3 However, notwithstanding the direction of development toward the most sustainable settlements within the district, each reasonable alternative spatial strategy option ultimately relies upon the allocation of land within all three Spatial Areas, including the North Wessex Downs AONB, to meet the overall housing needs for the district.
- 4.4 As noted within the Housing Background Topic Paper (2023)¹³, the North Wessex Downs AONB Spatial Area covers 74% of West Berkshire. Given the various constraints associated with the Newbury and Thatcham Spatial Area (including environmental, flooding, and heritage constraints), and with the Eastern Area Spatial Area (including flooding constraints and the Detailed Emergency Planning Zone), it is not considered to be reasonably practicable or sensible to accommodate the district's entire housing need in these areas.
- 4.5 Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas.
- 4.6 Sovereign **supports** the Council's proposed spatial strategy to the extent that development has clearly and appropriately directed toward the most sustainable locations within the district.

Supporting the Vitality and Viability of Rural Villages

- 4.7 However, it remains pertinent for an appropriate amount of development to be located within the North Wessex Downs AONB Spatial Area; given, in particular, the identified need for market and affordable housing to support the viability of the area's various Rural Service Villages and Service Villages, including Kintbury.

¹² Available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>.

¹³ Available online at: https://westberks.gov.uk/media/54001/Housing-Background-Paper-January-2023/pdf/Housing_Background_Paper_January_2023.pdf?m=638102336216470000.

- 4.8 In accordance with the discussion set out previously, in Section 3 of these representations, Sovereign recommend that any appropriate spatial strategy for West Berkshire must include the allocation of land to provide sustainable development at different levels across the current settlement hierarchy and within the different Spatial Areas.
- 4.9 Such an approach would align with the general principle of the district's existing spatial strategy, which would support the sustainable growth of the larger settlements, whilst providing sufficient growth for the abundance of medium and smaller-sized villages in the district to support their sustainable growth.
- 4.10 This strategy would also accord with paragraph 78 of the NPPF, which states:
- “Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*
- 4.11 Reductions in average household sizes, alongside low housebuilding rates, present a challenge for rural communities. Without an appropriate uplift in the level of development in these locations, there is a risk that local services in such areas would become unviable, undermining the vitality and sustainability of the district's rural villages.
- 4.12 In addition to helping maintain the vitality of the district's villages, medium and smaller-scale development in appropriate locations will assist with the district's housing delivery, both in the short-term and over the life of the plan period.
- 4.13 Paragraph 68 of the NPPF states that local planning authorities should promote a good mix of sites, with small and medium sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields¹⁴, which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.
- 4.14 As such, Sovereign **supports** the Council's commitment to allocate sufficient small and medium sized sites to maintain housing delivery throughout the plan period. Furthermore, Sovereign encourages the Council to seek to secure efficient delivery of new homes from any future proposed site allocations, i.e., maximising development potential whilst ensuring appropriate local character and context are respected. This would be particularly important for the smaller and medium-sized sites, which would help to ensure the district meets its housing needs in the shorter-term.

¹⁴ Available online at: <https://lichfields.uk/content/insights/start-to-finish>.

Development in the North Wessex Downs AONB Spatial Area

- 4.15 In seeking to identify sufficient development sites to meet the district's local housing needs, the Council has sought to accommodate a modest amount of new homes (approximately 8% of the overall need) within the North Wessex Downs AONB.
- 4.16 The NPPF, at paragraph 174, sets out that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: [inter alia] protecting and enhancing valued landscapes*" such as the country's Areas of Outstanding Natural Beauty. Furthermore, the NPPF clarifies, at paragraph 176, that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty*".
- 4.17 Given the significant housing need within the district, as set out in the previous discussion, there is clearly a need to accommodate a modest amount of residential development within the North Wessex Downs AONB Spatial Area. Sovereign **supports** the Council's proposed spatial strategy, in which a modest amount of new homes are proposed to support local communities within the area.
- 4.18 Furthermore, in determining appropriate locations to accommodate residential development within the North Wessex Downs AONB Spatial Area, Sovereign considers that the Council has clearly had due regard to the conservation and enhancement of the landscape and scenic beauty of the AONB, in accordance with Paragraph 176 of the NPPF.
- 4.19 The Council assessed parcels of land within the North Wessex Downs AONB Spatial Area through the Landscape Character Assessment ('LCA') and Landscape Sensitivity Assessment ('LSA') processes, which informed the Council's assessment of the potential *suitability* of sites for residential development.
- 4.20 This assessment is set out within the Council's HELAA (2023). The Council concluded that, taking account of the LCA/LSA process, several parcels of land within the AONB could be appropriate to accommodate development, subject to various recommendations to maintain and enhance the landscape and scenic beauty of the AONB, as set out in Policies SP2, SP15, and, in relation to the Land adjoining The Haven, Kintbury, RSA23.
- 4.21 Consequently, the proposed site allocations represent locations where development can best be situated within 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. As such, Sovereign considers that the proposed allocations sufficiently ensure that the special qualities of the AONB, and the settlements that sit within it, can be appropriately conserved and enhanced.

4.22 With regard to Land adjoining The Haven, Kintbury, the LSA (2011)¹⁵ concluded that the site has '*no visual link to the wider landscape*' and that '*the site has a strong relationship with the settlement*'. As such, the LSA concludes that development on the whole site would be acceptable subject to:

- the retention of boundary hedgerows and trees and scattered trees within the southern section of the site,
- the replacement of the conifer hedgerow with more appropriate planting,
- views from the surrounding countryside, Public Right of Way and the neighbouring recreation field being carefully considered, and
- the provision of new planting to integrate the buildings into the landscape.

4.23 Sovereign is committed to bringing forward development on the site in accordance with the recommendations of the LSA set out above.

4.24 In summary, Sovereign supports the Council's proposed spatial strategy and site allocations, which direct development toward the most sustainable locations in the district whilst accommodating an appropriate level of development within the North Wessex Downs AONB. The approach successfully conserves and enhances the special qualities of the AONB.

¹⁵ Landscape Sensitivity Assessment (2011) Pages 118-119. Available online at: https://www.westberks.gov.uk/media/36268/Kintbury-Area-of-Outstanding-Natural-Beauty-Landscape-Sensitivity-Assessment/pdf/Kintbury_Area_of_Outstanding_Natural_Beauty_Landscape_Sensitivity_Assessment.pdf?m=635320374907530000.

5. DEVELOPMENT MANAGEMENT POLICIES

- 5.1 The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.
- 5.2 Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.
- 5.3 As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

Policy SP2: North Wessex Downs AONB

- 5.4 Sovereign support draft Policy SP2 insofar as it recognises that the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.
- 5.5 However, to improve the effectiveness of the policy, it is recommended that the draft policy should explicitly set out that the principle of development is considered to be acceptable for the sites that are allocated within the North Wessex Downs AONB Spatial Area. This would avoid the subsequent need for each individual planning application to demonstrate that there are exceptional circumstances to make the development acceptable.
- 5.6 The Local Plan has already established that there are indeed exceptional circumstances to support development within the North Wessex Downs AONB Spatial Area, which ensure that such modest growth is within the public interest to come forward. Acknowledging that the allocated sites are acceptable, in principle, in this regard will avoid potential complications and delays further along in the planning process.
- 5.7 As such, the following criteria is recommended to be included:
- i) Sites within the North Wessex Downs AONB that are allocated for development within the West Berkshire Local Plan Review (2022 – 2039) are acceptable for development in principle and will be supported provided that they conserve and enhance the special landscape qualities of the AONB.

Policy SP7: Design Quality

- 5.8 Reference within this policy to ‘relevant community planning documents’ is problematic, as the phrase is not considered to relate to any specific identified set of considerations. It is recommended that the second paragraph of this policy is amended in accordance with the below:

- i) Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans and relevant material considerations community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.

5.9 Furthermore, Sovereign notes the Council's commitment to creating a 'sense of place' in new developments, which 'is about ensure that development responds in a holistic way'. Sovereign, as an organisation, is fully committed to the same approach, which is borne from our own Homes and Place Standard ('HPS'). Sovereign's HPS marks the organisation's commitment to building and maintaining good quality homes and better places to live. Whilst we have always striven for high standards in our developments, this new approach will underpin how we invest in our homes and how we build new communities.

Policy SP8: Landscape Character

5.10 As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed. To introduce greater flexibility within the policy and avoid unnecessary delays further in the planning process, the following amendments are recommended:

- i) Where appropriate, Pproposals for development major should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and Institute of Environmental Management & Assessment.

Policy SP10: Green Infrastructure

5.11 To avoid introducing potential delays in the planning process, it is recommended that additional clarification is necessary to support the final paragraph of this policy, in accordance with the below:

- i) Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community at the time of the determination of any planning application (with the exception of Reserved Matters where details of appropriate green infrastructure provision may be fixed as part of the outline planning permission).

Policy SP11: Biodiversity and Geodiversity

5.12 To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains which is not specifically the current metric developed by Natural England:

- i) All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using ~~the most up to date~~ an appropriate biodiversity accounting metric, either developed by Natural England or an agreed alternative, and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.

Policy SP12: Approach to Housing

5.13 Currently formulated, the proposed policy limits the exception to the net loss of residential units (i.e., where there is a reasoned justification in the form of a benefit to the wider community) to situations in which there is a change of use.

5.14 There are situations in which the public benefit of a net loss of residential units could be justified without a change of use occurring; for example, where an outdated apartment building is to be demolished and replaced to provide improved accommodation (e.g. larger units which meet Nationally Described Space Standards and address current housing needs). As such, the following amendment to the policy is recommended:

- ii) 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.

Policy SP15: Sites allocated for residential development in North Wessex Downs AONB

5.15 To ensure consistency within the document, it is recommended that additional wording is included within Policy SP15 to confirm that the identified capacity for each allocated site represents an approximate capacity and not a cap, as set out in Policy SP12:

- i) Development in the North Wessex Downs ~~AONB is will be~~ allocated for the approximate number of homes as follows:[...]

Policy SP18: Housing Type and Mix

5.16 Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases. To provide for greater flexibility to examine planning applications on a case-by-case basis, thereby improving the effectiveness of the policy, the following amendments are recommended:

- i) Around 10% of the new market housing and a maximum of 5 units of the affordable ~~sector~~ homes delivered on-site should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable or would be unfeasible to deliver.

Policy SP24: Infrastructure and Delivery

5.17 To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).

Policy RSA23: Land adjoining The Haven, Kintbury (Site Ref: KIN6)

5.18 Consistent with the comments made within these representations, Sovereign supports the allocation of the Land adjoining The Haven, Kintbury. However, it is recommended that the draft policy is revised to reflect the need to make effective use of land and to boost the supply of housing within the district:

- i) The provision of approximately at least 20 dwellings to be developed in a low density well-designed scheme in keeping with the surrounding area;

Policy DM40: Public Open Space

5.19 Paragraph 12.87 of the supporting text to Policy DM40 provides that “*Public open space should be genuinely available in perpetuity to the public at large. The Council will normally seek the transfer of public open space areas into local authority ownership/control in a condition appropriate for such use, and together with a reasonable sum for their ongoing maintenance.*”

5.20 Sovereign supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space (particularly where these areas are smaller in scale) and in certain circumstances it may be preferable that these are not transferred.

5.21 Accordingly, we would propose that the supporting text is revised to make more explicit allowance for such circumstances; e.g., “However, it is recognised that in some instances it may not be practical or desirable for the public open space to be transferred and these situations will be assessed on a case by case basis”.

Policy DM44: Parking

5.22 To ensure that the policy remains effective over the length of the plan period, it is recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant:

- i) Cycle and motorcycle parking should be provided in accordance with the Council's 'Cycling and Motorcycling Advice and Standards for New Development', or such other standards as may be prepared. This sets out design standards and expected levels of provision for different types of development.

[...]

- ii) The layout and design of parking spaces should follow the parking design guidance included within the Council's 'Highway Design Guidance for Residential Development', or such other standards as may be prepared, in order that good quality homes and neighbourhoods are created.

6. LAND ADJOINING THE HAVEN, KINTBURY

The Site

- 6.1 Land adjoining The Haven, Kintbury ('the site'), comprises approximately 1.5 hectares of land toward the south-western extent of Kintbury village. A Site Location Plan is provided at **Appendix 1: Site Location Plan**.
- 6.2 The site currently comprises an undeveloped open field, bordered by dense hedgerows with intermittent tree cover. Immediately to the north of the site lies Kintbury Rangers Football Club, which is further abutted by a range of sports facilities (including three tennis courts, a bowling green, and a skatepark), alongside the Jubilee Centre, a community sports building.
- 6.3 Beyond the well-vegetated site boundaries to the south and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.
- 6.4 The site is within a reasonably sustainable location, approximately 365 metres from Kintbury High Street, which represents a short 4-minute walk or 1-minute cycle from the proposed site access to The Haven. Several services are provided within Kintbury village, including:
- Kintbury St Mary's Primary School (420 metres);
 - Local convenience stores, including an independent butcher and a Post Office (380 metres);
 - Two Public Houses (460 and 710 metres);
 - The Jubilee Centre, Kintbury Tennis Club, Kintbury Bowls Club and Kintbury Skatepark (150 metres);
 - Kintbury Village Green (225 metres);
 - Allotments (400 metres);
 - Kintbury Village Hall (110 metres); and
 - Kintbury Rail Station (800 metres).
- 6.5 Development of site has the potential to deliver a range of benefits including:
- Approximately 35 high quality new homes, with a wide mix of housing sizes, types, and tenures, including much needed affordable housing;
 - Appropriate retention of existing trees and hedgerows, enhanced by additional planting and habitat creation to settle the development in the landscape and provide biodiversity net gains;
 - A high-quality development of homes designed to minimise resource use and carbon emissions, which is resilient to the effects of climate change; and
 - Developer contributions towards the provision of new and improved local infrastructure, potentially including improvements to the local transport network, maintenance of local sports facilities, and/or other benefits as appropriate.

- 6.6 Additionally, the development of this site within an existing area of residential development and may further trigger wider regeneration efforts within the locality, stimulated by the provision of additional investment and new households into the local area.

Deliverability of the Proposed Development

- 6.7 West Berkshire District Council assessed the site within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. The HELAA concluded that the site was *potentially available*, *potentially suitable*, and *achievable* for residential development within the proposed emerging plan period.
- 6.8 Sovereign **supports** the conclusion that residential development would be *achievable* on the site within the emerging plan period. However, Sovereign considers that the site is also immediately *available* for development and is *suitable* for residential development within the proposed emerging plan period in relation to the provisions set out in Planning Practice Guidance.
- 6.9 Furthermore, the submission of any forthcoming planning application for the development of the site would be supported by a series of appropriate technical reports, which would demonstrate the proposal's compliance with all relevant planning policies and demonstrate that suitable mitigation of any potential adverse impacts of the development has been incorporated as appropriate.

Availability

- 6.10 Sovereign is able to confirm that the site is immediately available for residential development. Although the land is currently within multiple landownerships, Sovereign benefits from an option over the entire extent of the site. Furthermore, there are no known legal restrictions to the development of the site for the proposed use.
- 6.11 Consequently, the site is considered to be *available* for residential development within the plan period, in accordance with PPG.

Suitability

- 6.12 In accordance with PPG, a site can be considered to be *suitable* if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Sovereign considers that there are no absolute constraints to the development of this site within the proposed plan period.
- 6.13 The Council's HELAA (2023) undertook an assessment of the suitability of the site in relation to a range of potential environmental and policy-based constraints. The assessment determined that the site is *potentially suitable*, based on the requirement for further information to determine the site's potential impacts and the extent of the developable area.

- 6.14 In relation to potential constraints to the development of the site, the HELAA identifies that the Council's Highways Team retained concerns over the potential impact of the development on Local Highway Capacity, in particular on the High Street, should the proposal comprise more than 22 dwellings.
- 6.15 However, given the sustainable location of the site, less than a 5-minute walk from the services located at the High Street, it is considered that the proposal would be unlikely to result in significant adverse impacts to Local Highway Capacity.
- 6.16 Sovereign is committed to ensuring that the development of the site is acceptable in relation to transport impacts. Accordingly, a Transport Note is provided at Appendix 2 in support of these representations.
- 6.17 As identified within the Transport Note, the proposed development of 35 new dwellings in this location will not give rise to any significant impacts on the operation of the transport network. Further, the Note demonstrates that all of the land necessary to provide access to the Site and the necessary visibility splays at local junctions is within the ownership of Sovereign or is Highways Land and is accordingly deliverable.
- 6.18 As part of any future planning application, a Transport Statement will be prepared and submitted to further assess the impacts of the proposed development and any suitable mitigation required. However, at this stage it is considered that robust evidence has been provided to demonstrate that there are no highways constraints, which would prevent the development of this Site.
- 6.19 Furthermore, in relation to the site's location within the North Wessex Downs AONB, the Council's Landscape Sensitivity Assessment (2011), in which the site was assessed under reference KIN011, concluded that development on the whole site would be acceptable subject to certain recommendations:
- the retention of boundary hedgerows and trees and scattered trees within the southern section of the site;
 - the replacement of the conifer hedgerow with more appropriate planting;
 - that views from the surrounding countryside, Public Right of Way and the neighbouring recreation field are carefully considered; and
 - the provision of new planting to integrate the buildings into the landscape.
- 6.20 Sovereign is committed to ensuring that residential development at the site is accommodated without harm to the natural beauty of the AONB. Sovereign is therefore committed to preparing a detailed Landscape and Visual Impact Assessment to inform the detailed design of the development proposal, to ensure that potential impacts are sufficiently mitigated and/or screened as appropriate.

- 6.21 Consequently, the potential concerns relating to the *suitability* of the site are not considered to represent absolute constraints to development and can be appropriately overcome. Sovereign considers that the site is therefore *suitable* for development in relation to the provisions set out in Planning Practice Guidance¹⁶.

Achievability

- 6.22 Given that the site is both *available* and *suitable* for the proposed quantum of development within the plan period, in combination with the modest scale of the site, it is considered that the proposed quantum of development identified within the current allocation could be achieved on the site within the first five years of the proposed plan period. Further, as identified through these representations it is considered that the site is capable of accommodating a greater quantum of development (approximately 35 new homes). Consequently, the site is considered to be *deliverable* in relation to the terms of the PPG.

Deliverability

- 6.23 As set out above, the site is *available* for development now, is in a *suitable* location for residential development, and is *achievable* for development in the early part of the proposed plan period. Consequently, the site is considered to be *deliverable* in relation to the provisions set out in Planning Practice Guidance.
- 6.24 Sovereign therefore **supports** the proposed allocation of the site for residential development within the Proposed Submission West Berkshire Local Plan Review (2022 – 2039) through Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.
- 6.25 Furthermore, in accordance with the discussion set out within these representations, Sovereign **recommends** that the proposed approximate capacity for residential development identified within the allocation is increased to approximately 35 dwellings, to reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district in accordance with the NPPF.
- 6.26 Revision of the approximate capacity of new homes that could be accommodated on the site is considered to be necessary to ensure that the emerging local plan is *positively prepared* and *effective* in meeting the identified housing needs for the district and in assisting with meeting unmet need arising from outside of West Berkshire.

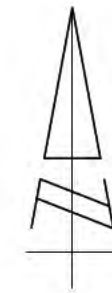
¹⁶ PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018-20190722.

7. CONCLUSION

- 7.1 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth provides to support medium and smaller-sized villages within the North Wessex Downs Area of Outstanding Natural Beauty.
- 7.2 Sovereign **supports** the Council's commitment to meeting housing needs in full and **supports** the Council's identification of a reasonable amount of headroom in the district's housing supply to ensure that local housing needs are met during the plan period.
- 7.3 However, Sovereign recommends that the Council seeks opportunities to maximise the development capacity of appropriate sites to ensure that the identified headroom is as robust as is reasonably practicable. Land adjoining The Haven, Kintbury, which is proposed to be allocated for the development of approximately 20 new homes under emerging Policy RSA23, presents such an opportunity. Sovereign considers that the approximate capacity allocated for the site could be higher, without detriment to the amenity of adjoining residents, with sufficient scrutiny to the design of the scheme and in considering greater benefits to the wider community. The provision of additional capacity could reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.
- 7.4 Furthermore, Sovereign **supports** the proposed spatial strategy, which includes a modest amount of residential development within the North Wessex Downs AONB Spatial Area. The approach maintains the existing spatial strategy within the district and would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing. The proposed allocations have also been evidenced and justified through detailed analysis to ensure the high value of the AONB and any potential impacts are carefully considered.
- 7.5 Otherwise relatively unconstrained, the nature of the district's North Wessex Downs AONB Spatial Area, which includes the presence of a series of sustainable, small and medium-sized villages, provides that the area remains appropriate to accommodate a reasonable proportion of the district's identified housing need. Furthermore, to support the longer-term viability of these villages, it is critical that the Council supports opportunities to provide modest growth in appropriate locations.
- 7.6 To this end, Sovereign **supports** the proposed allocation of Land adjoining The Haven, Kintbury, for residential development under emerging Policies SP15 and RSA23. Kintbury comprises a relatively unconstrained settlement that could accommodate a reasonable level of growth during the proposed plan period. Land adjoining The Haven is well-positioned to make a reasonable contribution to meeting the district's development needs in this location.

- 7.7 The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities within Kintbury. Furthermore, the site benefits from good access to nearby main settlement areas via bus and rail links, including Newbury and Reading. There are no significant constraints to the development of the site for approximately 35 new homes which could not be resolved through detailed, sensitive design consideration.
- 7.8 Sovereign is able to confirm that the site is *available* for development now, represents a *suitable* location for development, and that development of the site is *achievable* with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should continue to be favourably regarded in relation to allocation for residential development within the emerging West Berkshire Local Plan.
- 7.9 We look forward to continuing to work with West Berkshire District Council, Kintbury Parish Council, and the wider community to provide much-needed new housing in this rural community. We also look forward to exploring how the Land adjoining The Haven, Kintbury, can contribute to the delivery of sustainable development and benefit the village, local infrastructure, and facilities.
- 7.10 We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

APPENDIX 1 – SITE LOCATION PLAN



KEY:

EXTENT OF HIGHWAY MAINTAINABLE AT PUBLIC EXPENSE

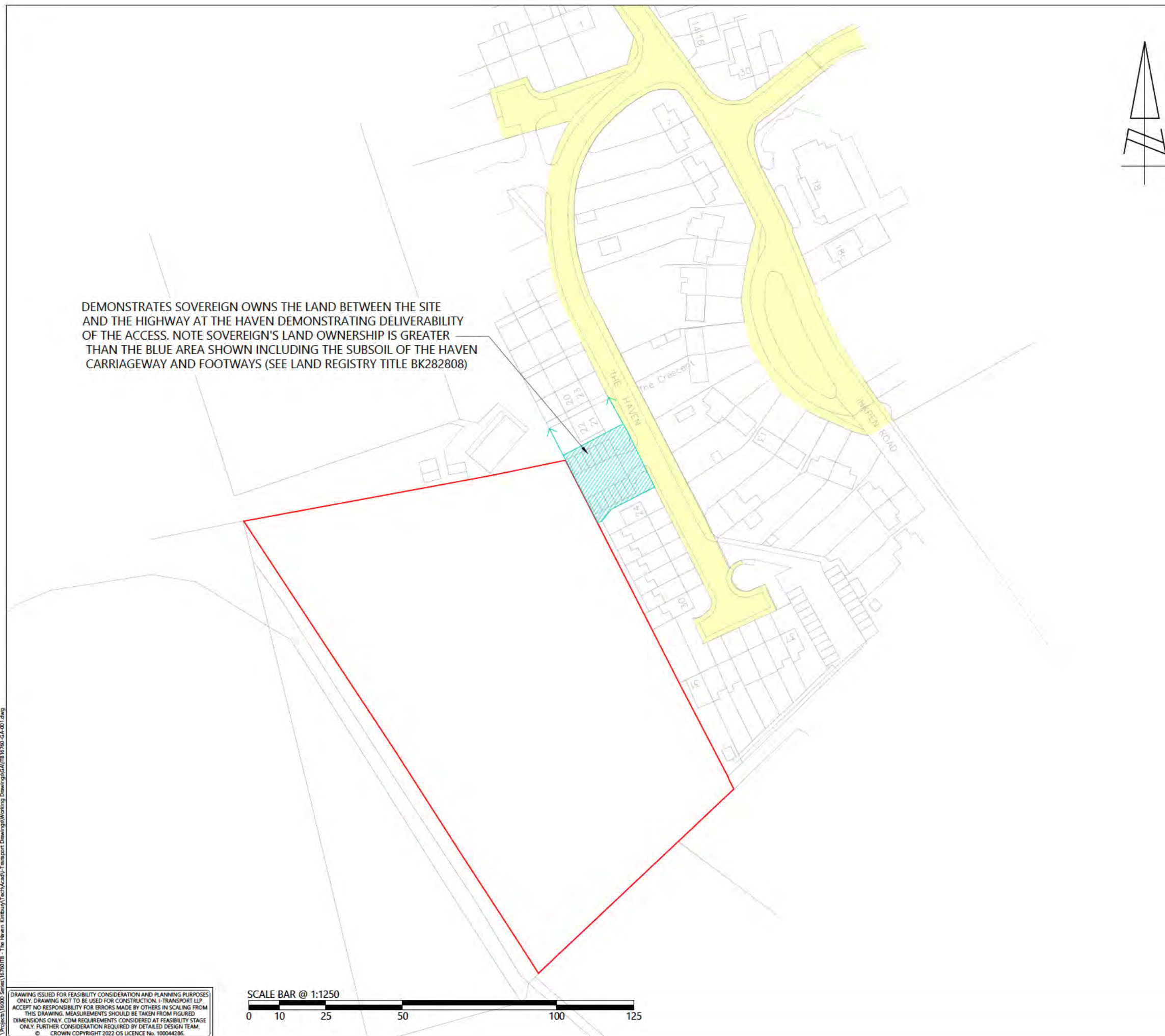
SOVEREIGN OWNED LAND (PART OF SOVEREIGN LAND FALLING UNDER LAND REGISTER TITLE BK282808)

LAND CONTROLLED BY SOVEREIGN (POLICY RSA23 - LAND ADJOINING THE HAVEN, KINTBURY)

NOTES:

ACCESS LOCATION AS SHOWN IN POLICY RSA23

DEMONSTRATES SOVEREIGN OWNS THE LAND BETWEEN THE SITE AND THE HIGHWAY AT THE HAVEN DEMONSTRATING DELIVERABILITY OF THE ACCESS. NOTE SOVEREIGN'S LAND OWNERSHIP IS GREATER THAN THE BLUE AREA SHOWN INCLUDING THE SUBSOIL OF THE HAVEN CARRIAGEWAY AND FOOTWAYS (SEE LAND REGISTRY TITLE BK282808)



REV	DATE	BY	DESCRIPTION	CHK	APD

STATUS: **FOR INFORMATION**

The Square, Basing View, Basingstoke, Hampshire, RG21 4EB
Tel: 01256 637940
www.i-transport.co.uk

TITLE: **LAND OWNERSHIP PLAN**

PROJECT: **THE HAVEN, KINTBURY**

CLIENT: **SOVEREIGN**

DRAWN: MM	CHECKED: PL	APPROVED: MG
PROJECT No: ITB16760	SCALE @ A3: 1:1250	DATE: 23.02.23

DRAWING No: **ITB16760-GA-001** REV: **-**

T:\Projects\16760\Series1\16760\ITB - The Haven Kintbury\i-Transport Drawings\Working Drawings\GA\ITB16760-GA-001.dwg

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APPENDIX 2 – SITE ACCESS TECHNICAL NOTE

Technical Note

Project No: ITB16760
Project Title: Land adjoining The Haven, Kintbury
Title: Site Access Arrangements
Ref: ITB16760-001A TN
Date: 2 March 2023

SECTION 1 Introduction

- 1.1.1** Sovereign Housing is promoting Land adjoining The Haven, Kintbury through West Berkshire Council's (WBC) emerging Local Plan Review 2022-2039.
- 1.1.2** WBC has published its Local Plan Review 2022-2039 Proposed Submission (consultation version 20th January 2023 – Regulation 19). This includes the following policy relevant to Sovereign's land interest at Kintbury:
- Policy RSA23 - Land adjoining The Haven, Kintbury (Site Ref: KIN6) – allocation for approximately 20 dwellings.
- 1.1.3** Sovereign is generally supportive of the principle of Policy RSA23. However, Sovereign has detailed comments on Policy RSA23 including some suggested changes to the policy wording.
- 1.1.4** Sovereign has appointed i-Transport to respond on the highway aspects of Policy RSA23. These representations should be read in conjunction with Sovereign's overarching planning representations prepared by Boyer Planning.

SECTION 2 Policy RSA23 - Land adjoining The Haven, Kintbury (Site Ref: KIN6)

2.1 Background

2.1.1 The land adjoining The Haven, Kintbury site (Site Ref: KIN6) is included as an allocation for approximately 20 dwellings under Policy RSA23 – see **Image 2.1** below.

Image 2.1 Extract from the Local Plan Review Proposed Submission – Policy RSA23



2.1.2 The policy states that the site will be required to be developed in accordance with a number of parameters including the following transport / highway parameters:

...

- g Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated;
- h A Transport Statement will be required as part of any planning application; and
- i Main internal walking and cycle routes for the site will be provided and will be linked to existing routes including the Public Rights of Way network.

...

2.2 Quantum of Development

2.2.1 As set out in Boyer's planning representations, the site is capable of accommodating approximately 35 dwellings with access from The Haven.

2.2.2 The remainder of this note considers the access and transport implications of up to 35 dwellings on the site.

2.3 Site Access from The Haven

2.3.1 The following appendices are provided:

- **Appendix A** - Sovereign's land control at land adjoining The Haven (land edged green);
- **Appendix B** – Sovereign's land ownership at The Haven (Land Registry Title BK282808); and
- **Appendix C** – plans provided by WBC showing the highway maintainable at the public expense along The Haven / Inkpen Road.

2.3.2 An overlay plan is provided at **Appendix D**. This shows that Sovereign owns the land at the location of the proposed access from The Haven (including the garage land) and that this land is contiguous with both Sovereign's land control at the allocation site and the highway maintainable at the public expense at The Haven. The site access is therefore deliverable on land owned / controlled by Sovereign (which is available to facilitate the development) and the highway.

2.3.3 The design of the site access including how any parking will be replaced is best dealt with as part of the site design and Design and Access Statement which would be undertaken at planning application stage.

2.3.4 As such, the following amended policy wording is proposed for Policy RSA23 bullet point g:

~~Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated~~

Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated. The access design including any replacement parking will be addressed at planning application stage.

2.3.5 The Haven has a carriageway width of approximately 5.5m with footways on either side. A carriageway width of 5.5m provides sufficient width for two large vehicles to pass whilst a 4.8m carriageway provides sufficient width for a car to pass a large vehicle / HGV. The actual carriageway widths at The Haven are therefore wide enough for a car to pass a large vehicle such as a refuse vehicle whilst also allowing a car to pass any cars parked on-street along The Haven.

- 2.3.6 Using a typical vehicular trip rate of 0.6 two-way peak hour car trips per dwelling, the weekday peak hour traffic generation of 35 dwellings on site is approximately 20 vehicles (1 vehicle every 3 minutes). These level of traffic flows increases can be accommodated on The Haven without any significant operational or safety impacts. In summary, The Haven will continue to be a lightly trafficked street with peak hour traffic flows less than 1 vehicle every minute.
- 2.3.7 Turning to The Haven / Inpken Road junction, the existing visibility splays at the junction are identified by WBC as follows:
- 2.4 x 23 metres to the south (right); and
 - 2.4 x 22 metres to the north (left).
- 2.3.8 Both splays are restricted by the hedge that forms the boundary between the highway and the front gardens to the dwellings on either side of The Haven at the junction.
- 2.3.9 WBC identifies that splays of 2.4m x 43m should be provided for prevailing vehicle speeds on Inkpen Road, which are circa 30mph (Inkpen Road is subject to a 30mph speed limit where it passes The Haven junction). Providing these splays will require cutting back/replanting of the garden hedges, which will also may require a small area of the front garden of each of the adjacent dwellings. These front garden areas are outside of the public highway but are in the ownership of Sovereign. The plan in **Appendix B** shows Sovereign's land ownership at The Haven (Land Registry Title BK282808) that includes both of these dwellings.
- 2.3.10 Drawing **ITB16760-GA-002** at **Appendix E** shows how visibility splays of 2.4m x 43m (30mph) can be achieved at the Inkpen Road/The Haven junction within land owned by Sovereign and the highway.
- 2.3.11 The Inkpen Road 20mph area starts just to the north of The Haven (just north of the Jubilee Centre / Recreation Ground access) and includes a gateway / traffic calming feature. The actual traffic speeds on Inkpen Road in the vicinity of The Haven are therefore likely to be lower than 30mph. The Transport Statement that will accompany any future planning application (see sub section 2.5 below) will include speed surveys along Inkpen Road which will determine actual visibility splay requirements. Drawing ITB16760-GA-002 at **Appendix E** also shows 2.4m x 25m visibility splays (20mph vehicle speeds) at the junction which would minimise any impact on adjacent hedges.
- 2.3.12 Therefore, the existing visibility issue at The Haven / Inkpen Road junction can be dealt with by Sovereign within highway land / land owned by Sovereign. As the Transport Statement for any future planning application is progressed it will include speed surveys to demonstrate actual vehicle speed (likely to be lower than the WBC required 30mph speed limit) to minimise any impact on adjacent hedges.

2.4 Main Internal Walking and Cycle Routes for the Site

- 2.4.1 The design of the internal walking and cycle routes for the site with linkages to existing routes including the Public Rights of Way network is best dealt with as part of the site design and Design and Access Statement which would be undertaken at planning application stage.
- 2.4.2 There are footways along both side of The Haven which the on site walking provision can readily connect into. There is a footway on the east side of Inkpen Road leading into the village centre.
- 2.4.3 With reference to WBC's online Public Rights of Way map there are no public rights of way that immediately effect the site – see **Image 2.2**.

Image 2.2 – Extract from WBC On-line Public Rights of Way Mapping



- 2.4.4 Sovereign is content with the policy wording proposed for Policy RSA23 bullet point i.

2.5 Transport Statement

- 2.5.1 The wording for Policy RSA23 bullet point h states that a Transport Statement will be required as part of any planning application.

- 2.5.2 This is agreed by Sovereign. The Transport Statement will assess the transport impacts that may arise from the Development, and to consider the proposal against the relevant transport planning policy considerations. It will set out any necessary transport mitigation measures that would be secured as part of any planning consent.
- 2.5.3 The weekday peak hour traffic generation of 35 dwellings on site is approximately 20 vehicles (1 vehicle every 3 minutes). This level of traffic will not have a significant impact on the operation of the highway network within Kintbury and beyond.
- 2.5.4 The Transport Statement will include a Travel Plan or Travel Plan Statement for the proposed development, the primary purpose of which will be to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling, public transport to reduce the demand for travel by less sustainable modes.
- 2.5.5 Sovereign is therefore content with the policy wording proposed for Policy RSA23 bullet point h.

SECTION 3 Conclusions

3.1.1 Sovereign Housing is promoting Land adjoining The Haven, Kintbury through West Berkshire Council's (WBC) emerging Local Plan Review 2022-2039.

3.1.2 WBC has published its Local Plan Review 2022-2039 Proposed Submission (consultation version 20th January 2023 – Regulation 19). This includes the following policy relevant to Sovereign's land interest at Kintbury:

- Policy RSA23 - Land adjoining The Haven, Kintbury (Site Ref: KIN6) – allocation for approximately 20 dwellings.

3.1.3 Sovereign is generally supportive of the principle of Policy RSA23. However, Sovereign has detailed comments on Policy RSA23 including some suggested changes to the policy wording.

3.1.4 As set out in Boyer's planning representations, the site is capable of accommodating approximately 35 dwellings with access from The Haven.

3.1.5 The statement reviews the transport impacts of 35 dwellings on the site, which are considered acceptable and will not have significant impacts on the operation of the transport network within Kintbury.

3.1.6 The following amended policy wording for the transport aspects of Policy RSA23 is proposed:

...

~~**g Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated;**~~

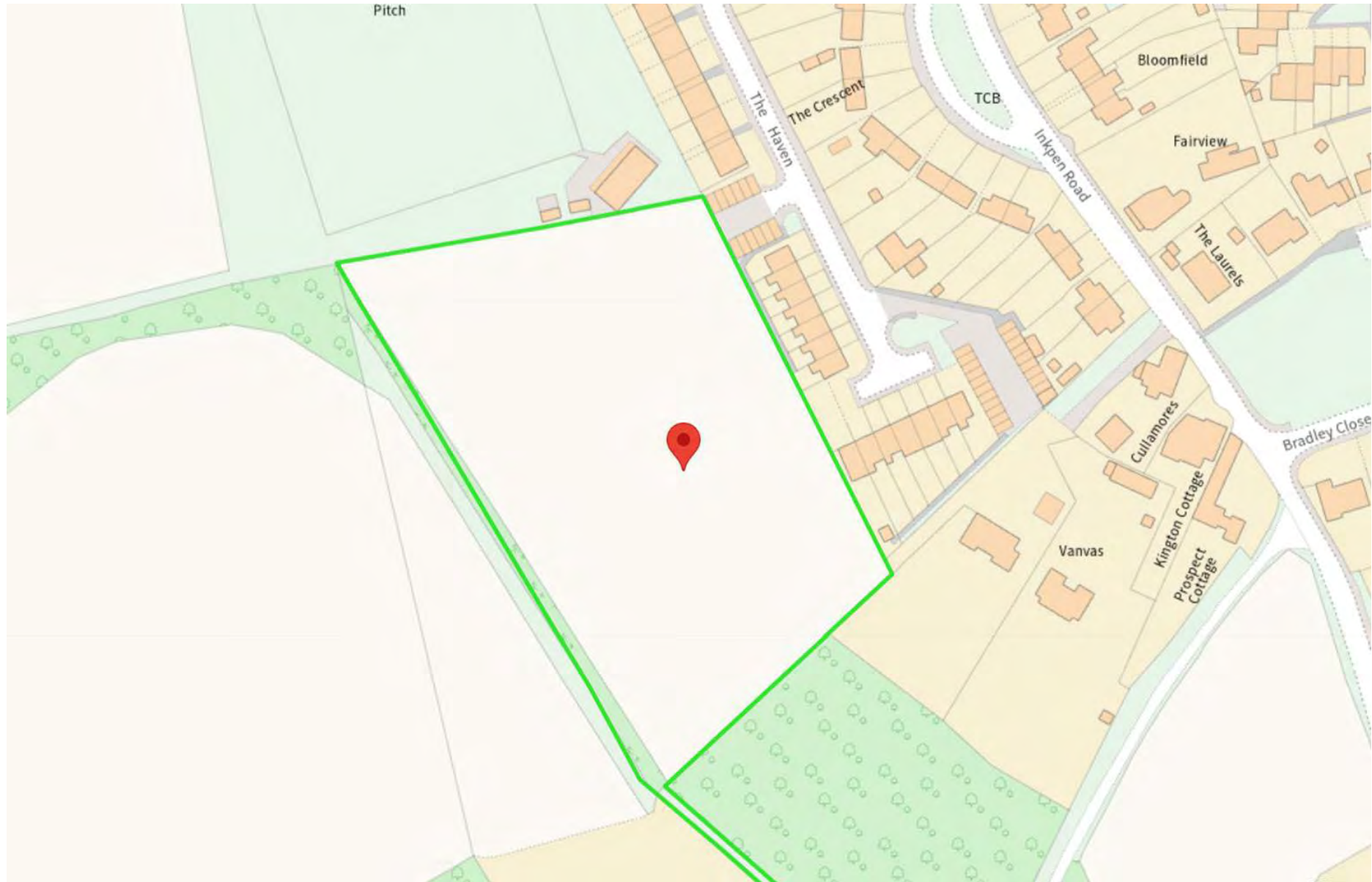
g Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated. The access design including any replacement parking will be addressed at planning application stage;

h A Transport Statement will be required as part of any planning application;

i Main internal walking and cycle routes for the site will be provided and will be linked to existing routes including the Public Rights of Way network;

...

APPENDIX A. SOVEREIGN LAND CONTROL AT THE ALLOCATION SITE



**APPENDIX B. SOVEREIGN LAND OWNERSHIP AT
THE HAVEN**

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

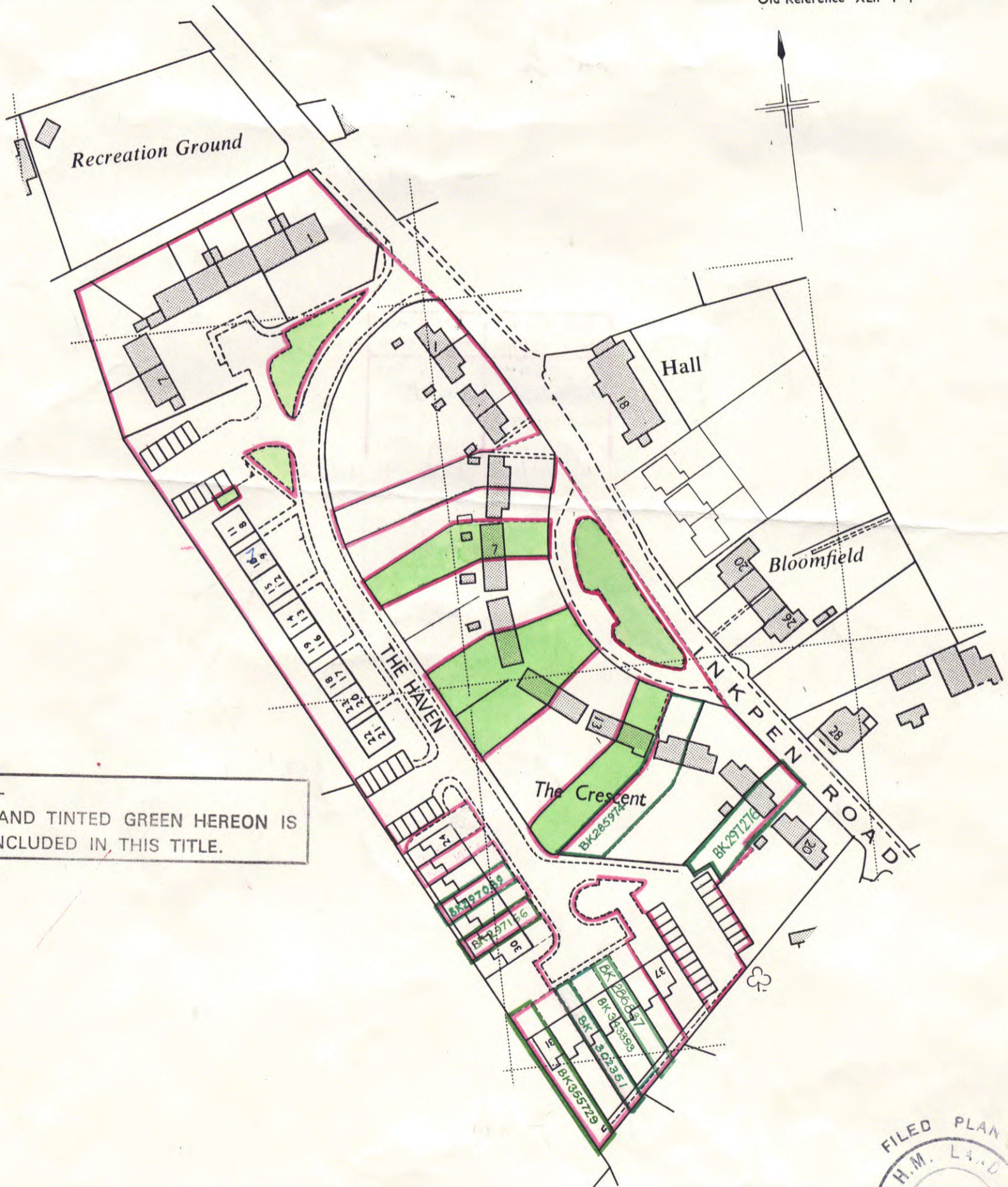
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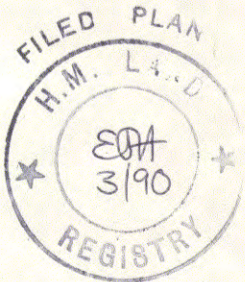
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H.M. LAND REGISTRY			TITLE NUMBER	
			BK 282808	
ORDNANCE SURVEY PLAN REFERENCE	COUNTY	SHEET	NATIONAL GRID	SECTION
	BERKSHIRE		SU 3866	F
Scale: 1/1250 Enlarged from 1/2500		NEWBURY DISTRICT	© Crown copyright 1989	
Old Reference XLII I F				



NOTE :-
THE LAND TINTED GREEN HEREON IS
NOT INCLUDED IN THIS TITLE.



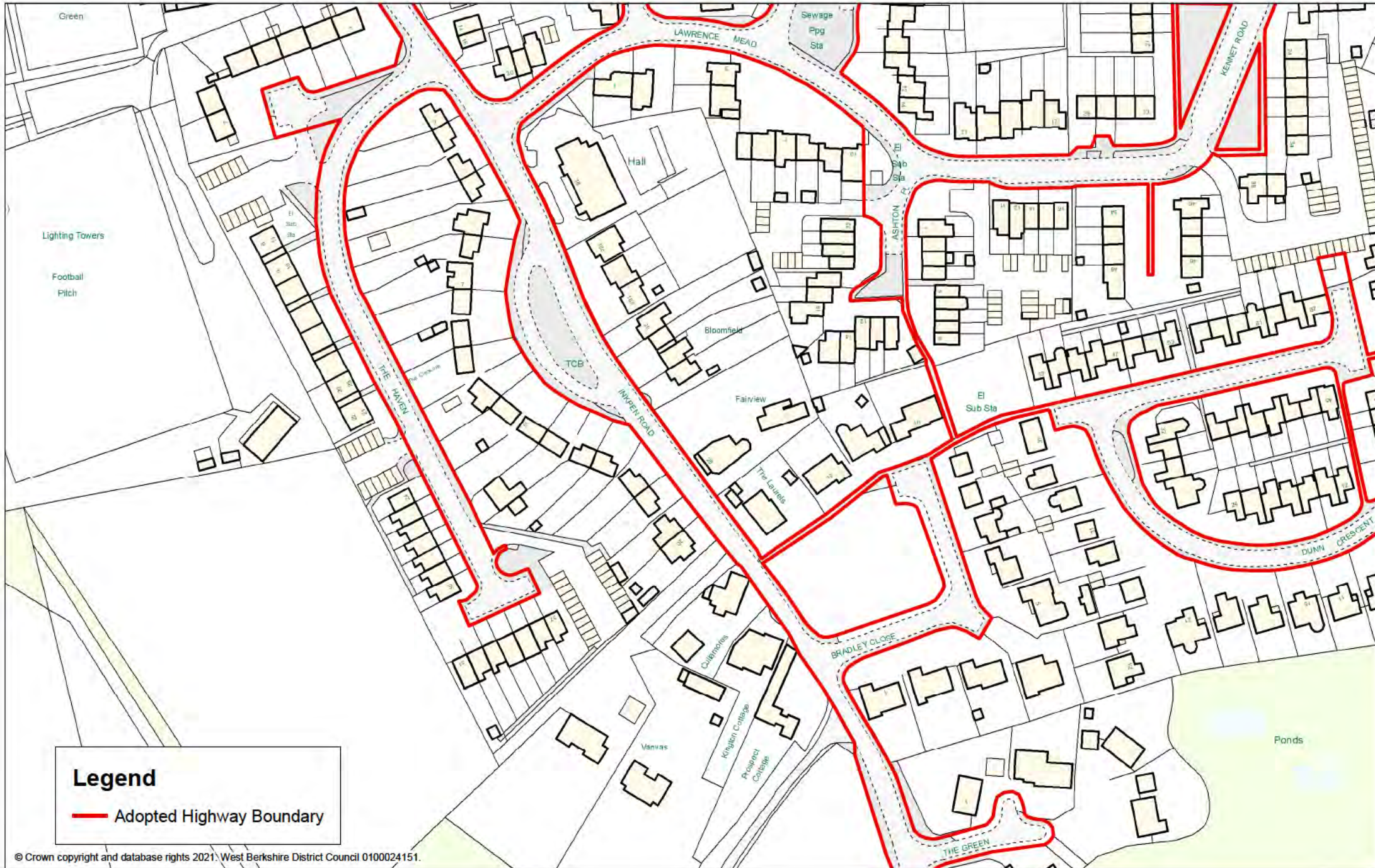
**APPENDIX C. HIGHWAY MAINTAINABLE AT THE
PUBLIC EXPENSE – THE HAVEN**

The Haven, Kintbury RG17 9TX - Plan 1



13/02/2023

1:1600

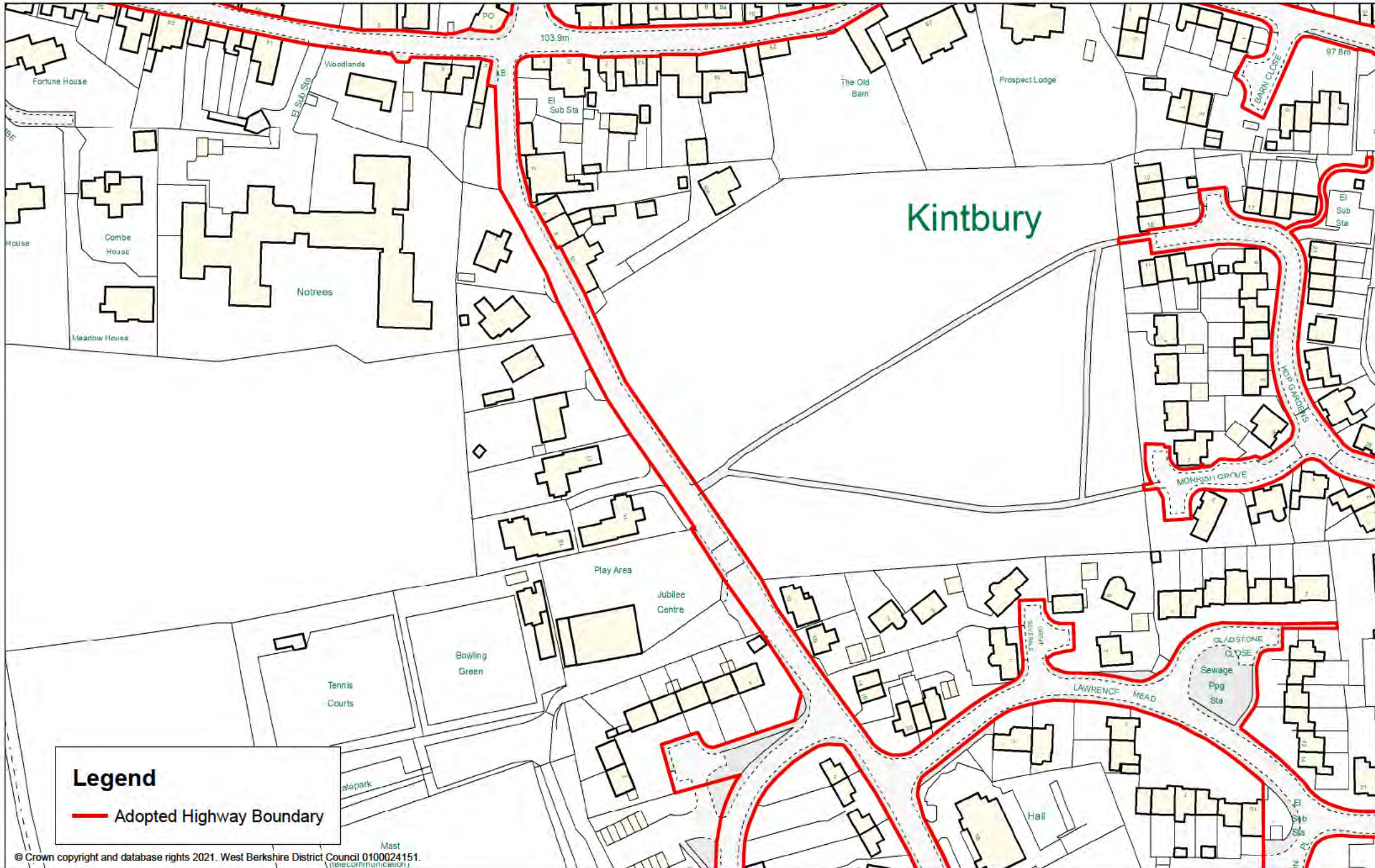


The Haven, Kintbury RG17 9TX - Plan 2



13/02/2023

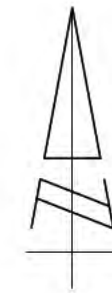
1:1600



Legend

— Adopted Highway Boundary

APPENDIX D. OVERLAY PLAN



KEY:

EXTENT OF HIGHWAY
MAINTAINABLE AT PUBLIC EXPENSE

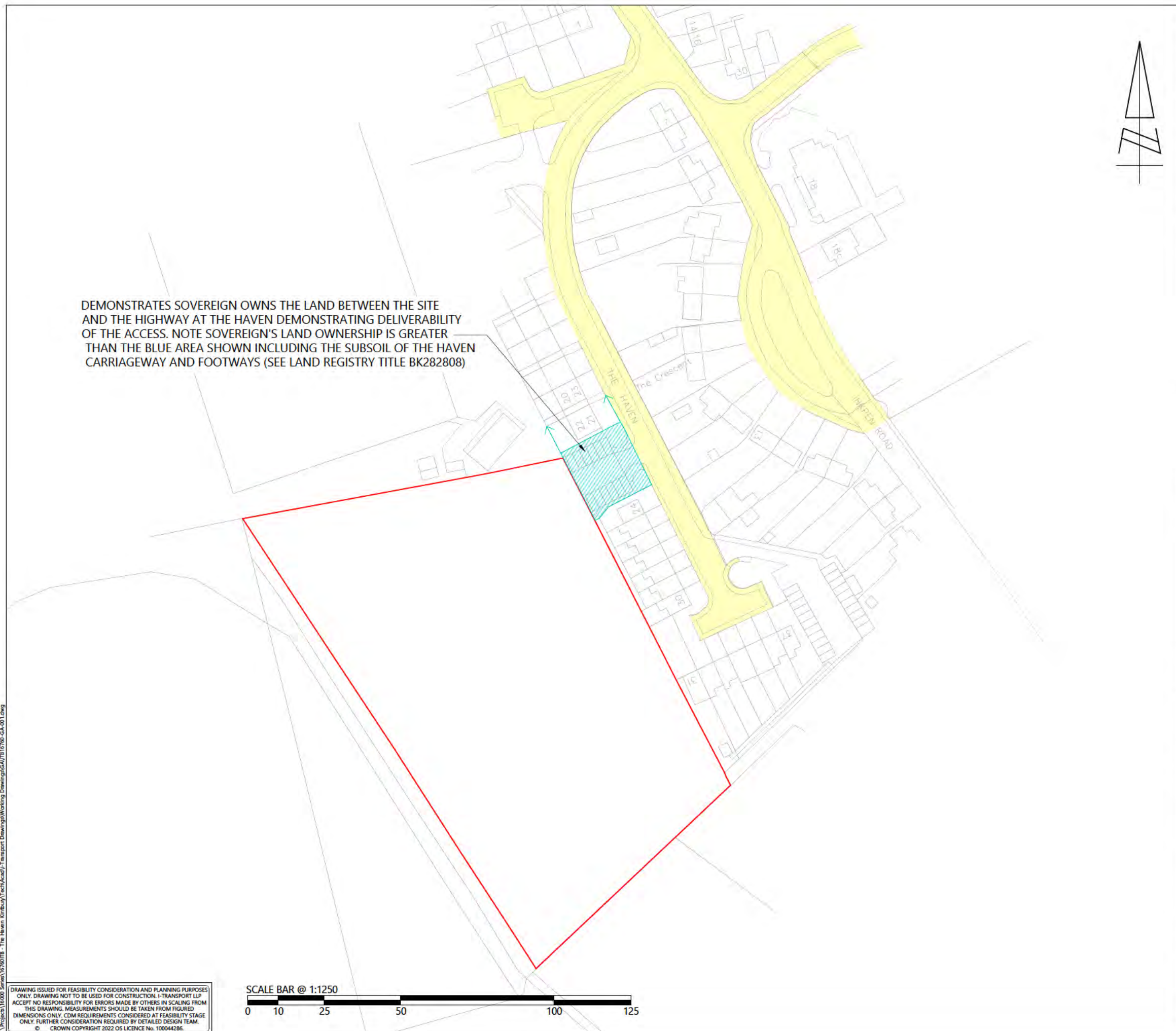
SOVEREIGN OWNED LAND (PART OF
SOVEREIGN LAND FALLING UNDER
LAND REGISTER TITLE BK282808)

LAND CONTROLLED BY SOVEREIGN
(POLICY RSA23 - LAND ADJOINING
THE HAVEN, KINTBURY)

NOTES:

ACCESS LOCATION AS SHOWN IN POLICY RSA23

DEMONSTRATES SOVEREIGN OWNS THE LAND BETWEEN THE SITE AND THE HIGHWAY AT THE HAVEN DEMONSTRATING DELIVERABILITY OF THE ACCESS. NOTE SOVEREIGN'S LAND OWNERSHIP IS GREATER THAN THE BLUE AREA SHOWN INCLUDING THE SUBSOIL OF THE HAVEN CARRIAGEWAY AND FOOTWAYS (SEE LAND REGISTRY TITLE BK282808)



REV	DATE	BY	DESCRIPTION	CHK	APD

STATUS: **FOR INFORMATION**

i-Transport

The Square, Basing View, Tel: 01256 637940
Basingstoke, Hampshire, RG21 4EB
www.i-transport.co.uk

TITLE: **LAND OWNERSHIP PLAN**

PROJECT: **THE HAVEN, KINTBURY**

CLIENT: **SOVEREIGN**

DRAWN: MM	CHECKED: PL	APPROVED: MG
PROJECT No: ITB16760	SCALE @ A3: 1:1250	DATE 23.02.23

DRAWING No: **ITB16760-GA-001** REV: **-**




T:\Projects\16760\Series1\16760\ITB - The Haven Kintbury\Tech\Acad\i-Transport Drawings\Working Drawings\GA\ITB16760-GA-001.dwg

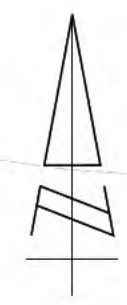
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**APPENDIX E. VISIBILITY SPLAYS – THE HAVEN /
INKPEN ROAD JUNCTION**

KEY:

EXTENT OF HIGHWAY MAINTAINABLE AT PUBLIC EXPENSE 

SOVEREIGN OWNED LAND (PART OF SOVEREIGN LAND FALLING UNDER LAND REGISTER TITLE BK282808) 



INDICATIVE EXISTING GATEWAY ENTRANCE/
TRAFFIC CALMING INTO 20mph AREA

2.4m x 43m VISIBILITY SPLAY

2.4m x 25m VISIBILITY SPLAY

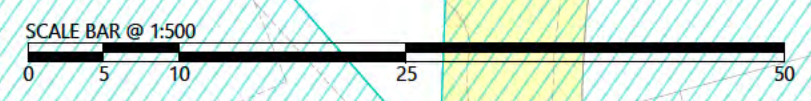
INKPEN ROAD

LAWRENCE MEAD

THE HAVEN

2.4m x 25m VISIBILITY SPLAY

2.4m x 43m VISIBILITY SPLAY



REV	DATE	BY	DESCRIPTION	CHK	APD

STATUS: **FOR INFORMATION**



The Square, Basing View,
Basingstoke, Hampshire, RG21 4EB
Tel: 01256 637940
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TITLE:
VISIBILITY SPLAYS FROM EXISTING ACCESS

PROJECT:
THE HAVEN, KINTBURY

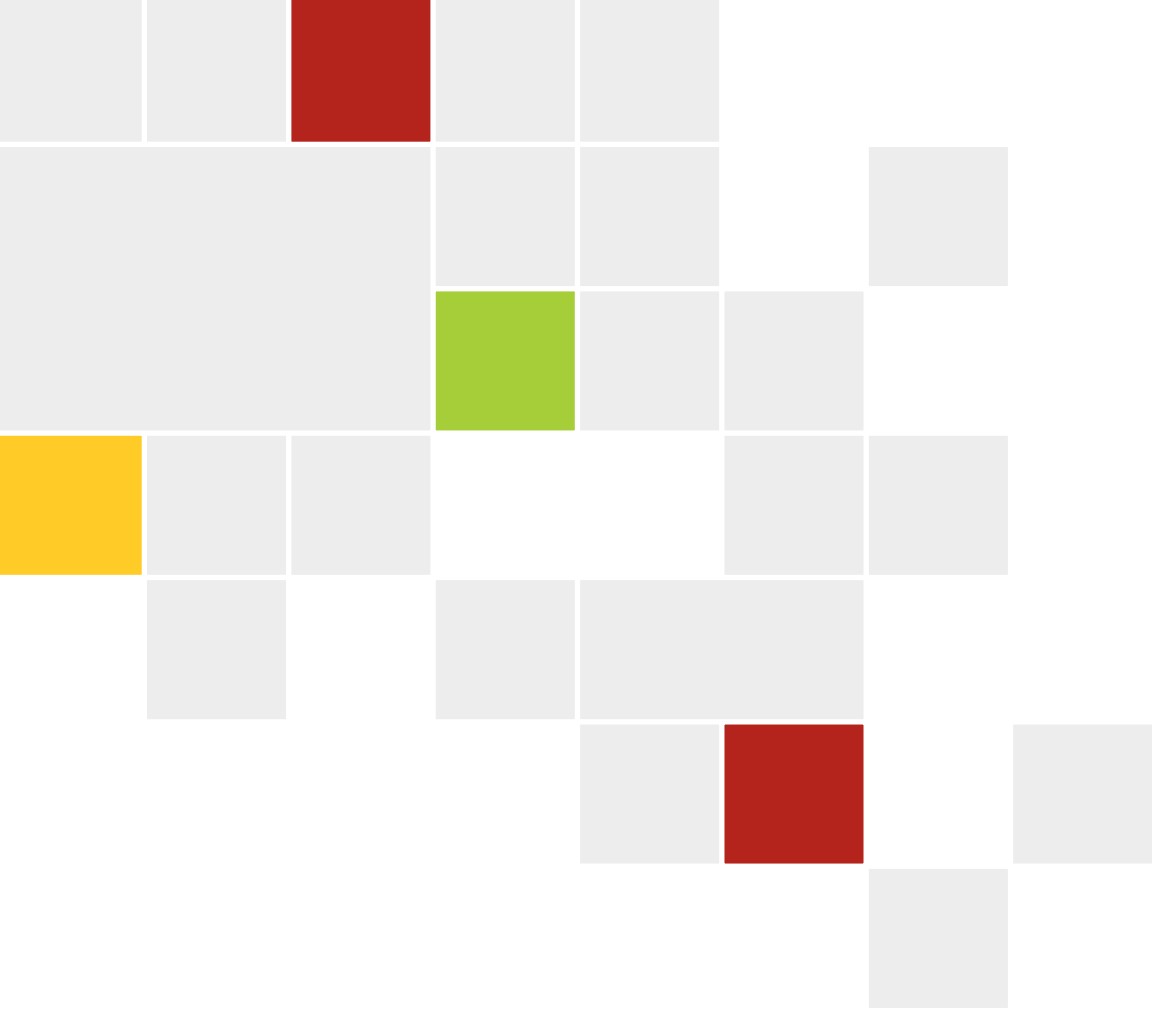
CLIENT:
SOVEREIGN

DRAWN: MM	CHECKED: PL	APPROVED: MG
PROJECT No: ITB16760	SCALE @ A3: 1:500	DATE: 23.02.23

DRAWING No: **ITB16760-GA-002** REV: **-**

T:\Projects\16760_Series1\16760\ITB - The Haven, Kintbury\i-Transport Drawings\Working Drawings\GA\ITB16760-GA-002.dwg

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Boyer

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