

West Berkshire
Housing and Economic Land Availability
Assessment

February 2020

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Disclaimer

The Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within West Berkshire that may have potential for residential and economic development. Most of the sites are submissions from landowners and developers for possible future development potential. It is important to note they are **NOT sites allocated for development**. The decisions regarding which sites will be proposed for allocation will be made in the West Berkshire Local Plan Review to 2036, and neighbourhood development plans, which will be subject to full public consultation and examination before any site or plan is adopted.

The identification of potential sites in the HELAA does not state or imply that the council will necessarily grant planning permission for development. All planning applications will continue to be determined against the current development plan and other relevant material considerations.

The HELAA includes estimates of potential on individual sites. These are not based on detailed designs so should not be assumed as acceptable for the purposes of development management decisions and should not prejudice any decision that may be made on the site at a later date.

The boundaries of sites are based on the information provided by agents and landowners. The HELAA does not limit the amendment of these boundaries for the purposes of a planning application.

1. Introduction

- 1.1. The HELAA is one of the key evidence documents which will inform the West Berkshire Local Plan Review to 2036. It will also form part of the evidence base for the neighbourhood development plans that are being prepared within the district. The HELAA is a technical study which aims to identify as many potential sites as possible for residential and economic development uses in West Berkshire district.
- 1.2. The HELAA differs from some of the other key evidence documents such as the Economic Development Needs Assessment (EDNA)¹. Such a document sets out the need for new development, whilst the HELAA sets out the capacity for delivering that development.
- 1.3. Importantly, the HELAA does not allocate sites. It is for the plan-making process to determine which sites are appropriate for residential and economic development, with any potential sites being subject to consultation and independent examination.

Policy context

- 1.4. The requirement to undertake a Housing and Economic Land Availability Assessment (HELAA) is set out in the revised National Planning Policy Framework (NPPF) 2019².
- 1.5. The HELAA addresses both the supply of land for housing and economic development, as recommended by the National Planning Practice Guidance (PPG)³.

Methodology

- 1.6. The PPG published in March 2014, and updated in July 2019, contains detailed guidance on an appropriate methodology for the assessment. This reaffirms the advantages of carrying out land assessments for housing and economic development as part of the same exercise and that such an assessment should:
 - *identify sites and broad locations with potential for development;*
 - *assess their development potential;*
 - *assess their suitability for development and the likelihood of development coming forward (the availability and achievability).*
- 1.7. Figure 1 (on page 5) is the flow chart from the PPG which illustrates the basic methodology for a HELAA.
- 1.8. A joint HELAA methodology⁴ was developed and agreed with four other Berkshire unitary authorities – Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council. Of the Berkshire authorities, only Bracknell Forest Borough Council (BFBC) did not sign up to the methodology because work was already underway on their own methodology.

¹ West Berkshire Economic Development Needs Assessment (October 2016):

<https://info.westberks.gov.uk/CHttpHandler.ashx?id=44629&p=0>

² National Planning Policy Framework (February 2019): <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ National Planning Practice Guidance (November 2016): <https://www.gov.uk/government/collections/planning-practice-guidance>

⁴ Berkshire Housing and Economic Land Availability Assessment Methodology (November 2016):

<https://info.westberks.gov.uk/CHttpHandler.ashx?id=43267&p=0>

Nonetheless, BFBC contributed to discussions around the methodology, and it is considered that the two approaches are largely compatible.

1.9. The joint methodology is based on, and complies with, the standard methodology in the Planning Practice Guidance. The main stages are as follows:

- Stage 1 – identification of sites and broad locations
- Stage 2 – site and broad location assessment
- Stage 3 – windfall assessment
- Stage 4 – assessment review
- Stage 5 – final evidence base

1.10. The preparation of a joint methodology with the other Berkshire authorities, particularly those within the same Housing Market Area (Bracknell Forest, Reading, West Berkshire, and Wokingham are all within the Western Berkshire Housing Market Area) enables HELAAs to be brought together to form a consistent evidence base regarding development potential in the area. Whilst a single study covering the Housing Market Area would have been the most appropriate approach for consistency, this has not been practical due to there being four different plan-making timetables. The approach of the joint methodology contributes towards ensuring that the Duty to Cooperate is met.

1.11. Stakeholders, including the development industry and neighbouring authorities were consulted on the methodology between May and June 2016 with 17 responses received. A summary of those representations and the officer response to those issues raised are included in Appendix B of the published HELAA Methodology (2016)⁵.

Identified Needs

1.12. The needs that West Berkshire must plan for are identified as follows:

(a) Housing

The NPPF expects plan-making authorities to follow the standard approach for assessing local housing need, unless there are exceptional circumstances that justify an alternative. The methodology has been published as part of the PPG on Housing and economic needs assessment⁶.

West Berkshire has followed this standard approach which results in a minimum housing need figure of 520 dwellings per annum as at the date of publication of this HELAA. This figure will be reviewed annually to take account of newly published household projections and affordability ratios in advance of submission of the local plan review to the secretary of state. Given that this figure will change annually, **the council intends to identify its requirement as a range rather than a single figure**. The lower end of this range will be the local housing need figure, calculated using the standard approach, as at the date of submission. For the purposes of the HELAA, the range 551-631 (contained in the Regulation 18 consultation of December 2018,) is being used.

⁵ HELAA Methodology (November 2016):

<https://info.westberks.gov.uk/CHttpHandler.ashx?id=43267&p=0>

⁶ Planning Practice Guidance (March 2015 with updates in July 2019):

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

(b) Other types of accommodation:

The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA, February 2016) identifies a need for 599 bedspaces of residential care in West Berkshire up to 2036. The council has commissioned consultants to undertake work which will update this need, however this work has not yet been completed therefore the need as identified in the SHMA will continue to be used for the time being.

(c) Offices

The Western Berkshire Economic Development Needs Assessment (EDNA), October 2016 identified various levels of need for new offices up to 2036 under different employment growth scenarios. Given more recently published government policy and planning guidance, and the publication of more up to date economic forecasts, the council has commissioned consultants to prepare an Employment Land Review (ELR) to inform the review of economic development and employment land policies. The ELR is nearing completion and will be published later this year. It will assess the future demand and need for office floorspace. Until such time as this work is completed, the council cannot yet say what the identified need is. The HELAA will be updated to reflect the need for office floorspace once known.

(d) Industry and warehouses

The Western Berkshire EDNA also calculated need for industrial and warehouse floorspace to 2036. The ELR will also update this work and assess the future need and demand for industrial floorspace. Until such time as this work is completed, the council cannot yet say what the identified need is. The HELAA will be updated to reflect the need for industry and warehouse floorspace once known.

(e) Retail

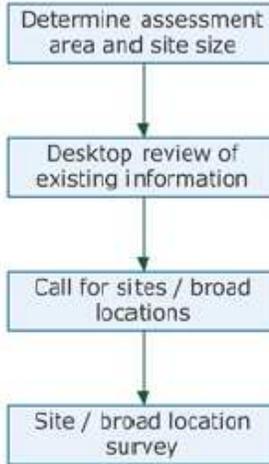
The Western Berkshire Retail and Commercial Assessment⁷ produced in conjunction with Bracknell Forest Council, Reading Borough Council, and Wokingham Borough Council was published in April 2017. A net need of 23,500 sq m retail and related space was identified.

(f) Leisure

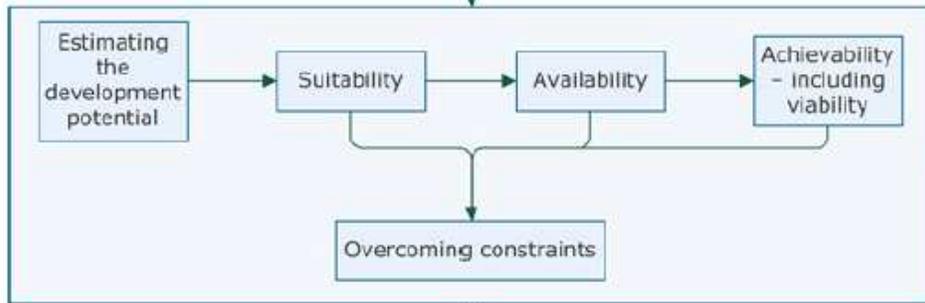
The need for leisure is not identified in terms of floorspace, rather it identifies specific types of facility. No floorspace figure is therefore used in this HELAA.

⁷ Western Berkshire Retail and Commercial Assessment (April 2017):
<https://info.westberks.gov.uk/CHttpHandler.ashx?id=44209&p=0>

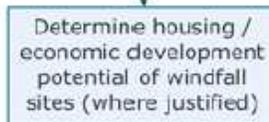
Stage 1 - Site / broad location identification



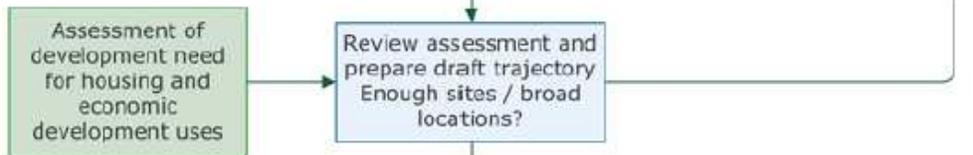
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base

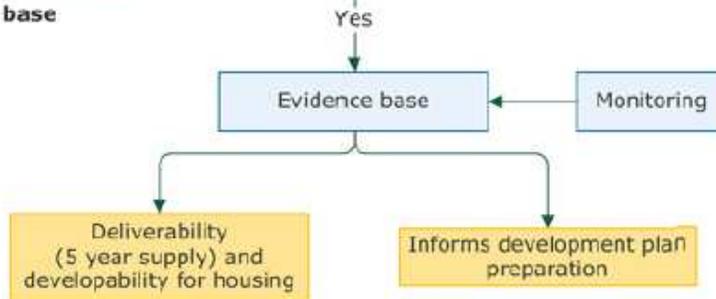


Figure 1.1: Basic HELAA Methodology (Source: Planning Practice Guidance)

2. Stage 1 – site identification

2.1 The joint methodology divides stage 1 into 4 steps:

- Determining site size
- Desktop review of existing information
- Call for sites/broad locations
- Site/broad locations survey

Determining site size

2.2 At the time of publication of the HELAA methodology in November 2016, Planning Practice Guidance included advisory thresholds for sites and broad areas. The methodology therefore specified that residential sites capable of accommodating five or more dwellings, or sites of 0.25 hectares (ha) or over or capable of accommodating 500sq m of floorspace for economic development should be included.

2.3. The revised NPPF that was published in February 2019 identifies at paragraph 68 that small and medium sites can make an important contribution to meeting the housing requirement of an area, and local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than 1ha through the development plan and brownfield registers. No minimum threshold will therefore be used for residential development.

2.4. In respect of economic development, no sites under 0.25ha have been promoted however there is one site of 0.2ha (THA15) that has been promoted for a mix of uses including employment and residential. Because it includes residential, where no threshold is used, the site has been assessed.

2.5 The sources of sites for consideration are set out in paragraphs 2.6 – 2.8.

Desktop review of existing information

2.6 There are many potential sources of sites or broad areas for consideration in the HELAA. These are summarised below:

- sites allocated in adopted development plan documents – this includes those sites allocated in the Core Strategy Development Plan Document (DPD), Housing Site Allocations DPD, and the Stratfield Mortimer Neighbourhood Development Plan;
- sites with existing planning permission which were either not started or under construction at 31 March 2019 (this is the most recent base date for which the monitoring data is available);
- West Berkshire Council-owned sites;

2.7. The HELAA methodology does identify some other potential sources for identifying sites, e.g. planning applications that have been refused or withdrawn, surplus and likely to become surplus public sector land; additional opportunities in established uses, business requirements and aspirations, sites in rural locations, large scale redevelopment and redesign of existing residential areas, sites in adjoining villages or settlements, rural exception sites, and potential urban extensions and new free standing settlements.

2.8. Due to the high number of sites that were promoted to the Council, officers considered that many of the sources identified in paragraph 2.7 were covered by the sites that had been promoted. These comprise:

- sites promoted by Homes England;
- several sites were subject to applications which were refused / dismissed at appeal;
- 58 sites promoted are previously developed, whilst a further 22 are a mix of previously developed and undeveloped land;
- sites promoted include those within rural locations;
- sites promoted include those within and adjoining settlements;
- one site is seeking a large scale redevelopment of an existing economic area;
- four of the sites promoted form part of the proposed Grazeley garden settlement which is currently subject to masterplanning;
- 24 sites promoted are for economic development.

Base date

2.9. The base date for this version of the HELAA is 31 March 2019. This is the date for which the last information on development progress is available. Information providing the basis for the assessment is correct to that date. In some cases, later information where known is taken into account – for instance, the fact that a development has commenced after 31 March 2019 provides a guarantee that the site is achievable, and this is taken into account in the assessment.

2.10. Monitoring of permissions for the 2019/2020 monitoring year will begin in April 2020, and is expected to be finalised and published in autumn 2020. This will feed into a revised version of the HELAA to be published in autumn 2020.

Call for sites

2.11. The Council publicised a formal 'Call for Sites' in December 2016 for an 18 week period up to 31 March 2017, however in response to numerous requests the council continued to accept sites for a further year. In addition, the council reopened the 'Call for Sites' during the Local Plan Review to 2036 regulation 18 public consultation which ran from 9 November – 21 December 2018. All sites submitted prior to 21 December 2018 have been included within this HELAA and assessed in accordance with the methodology.

2.12. Sites that were previously submitted to the Council's SHLAA have not been rolled forward into the HELAA as it was felt that there has been a significant time lapse from the original submission of these sites (between 2011 and 2013) and the start of the HELAA work. Taking such an approach has ensured that there is greater certainty on the availability of sites. SHLAA sites have only been considered if re-submitted during the 'Call for Sites', and this was made clear during the 'Call for Sites'.

2.13. Sites which have been promoted, but which have gained planning permission and have commenced on or before 31 March 2019, have been considered separately. This prevents double counting in both the HELAA and housing commitments.

Full list of sites

- 2.14. 282 sites were identified via the 'Call for Sites' and through the desktop review of existing information.
- 2.15. This represents a broad range of land with development potential in the district. The sites have been collated into a database and given codes based on parish name and number, e.g. CA1 = site number 1 assessed in Cold Ash parish.
- 2.16. During the preparation of the HELAA, officers were notified by the promoters of 15 sites that they no longer wanted them to be considered. It is for this reason that it appears that some sites are missing from the list of sites, i.e. BUR7, HUN1, HUN2, HUN13, HUN15, NEW4, PAN2, PUR1, SCD3, TIL4, TIL8, TIL9, TIL10, TIL11, and TIL12.

Site/broad location survey

- 2.17. The joint methodology agreed several types of site that would be excluded from further assessment due to being significantly constrained by one or more of the following criteria:
- Functional flood plain
 - Special Area of Conservation (SAC)
 - Special Protection Area (SPA)
 - Within 400 metres of the Thames Basin Heaths SPA
 - RAMSAR site
 - Site of Special Scientific Interest (SSSI)
 - Suitable Alternative Natural Greenspace (SANG)
 - Ancient woodland
 - Notified safety zones
- 2.18. The exclusion of such sites is consistent with legislation and national planning policy, and the joint methodology expands on this further in Table 4 of the joint methodology.
- 2.19. Five categories of the land listed in 2.17 exist within West Berkshire district:
- Functional floodplain
 - Special Area of Conservation
 - Site of Special Scientific Interest
 - Ancient Woodland
 - Notified safety zones, e.g. those associated with Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield.
- 2.20. Where a site is partially constrained by one of the above criteria, such as the functional floodplain, it will have proceeded to the next stage of assessment, whilst recognising that part of the site is unlikely to be developed.
- 2.21. Although the HELAA methodology identifies notified safety zones as an automatic exclusion criteria, it also states the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. Therefore sites within notified safety zones have gone through to Stage 2 of the HELAA (site assessment) and advice from the Ministry of Defence has been fed into the site assessments.

2.22. It should be noted that as of January 2020, the notified safety zones (in this case called the Detailed Emergency Planning Zones) for AWE Aldermaston and AWE Burghfield are being reviewed. The outcome of the review is expected in May 2020, and could impact on the suitability of some sites.

2.23. Only one site has been excluded from further consideration:

Site reference	Site name	Site area (ha)	Reason for exclusion
THE10	Land at Wigmore Lane, Theale	2.4	99.9% of the site is within the functional floodplain (Flood Zone 3b)

Table 2.1: Sites excluded at Stage 1

3. Stage 2 – site and broad location assessment

- 3.1. The second stage assesses the development potential of each of the sites that were not excluded during Stage 1. This was carried out through a combination of desktop assessments and site visits.
- 3.2. There are four main steps to stage 2, namely 2a – 2d:
 - 2a – estimating development potential
 - 2b – assessing suitability
 - 2c – assessing availability
 - 2d – assessing achievability

Step 2a: Estimating development potential

Residential uses

- 3.3. The assessment of the development potential of each site proposed for residential (C3) use is an estimate based on a 'pattern book' approach but is subject to potential adjustment through the HELAA process as further site specific evidence emerges.
- 3.4. In 2019, West Berkshire District Council commissioned David Locke Associates to review and update the council's assessment density pattern book. The West Berkshire Density Pattern Book⁸ gives guidance for high-level residential (C3 use class) site capacity assessment within the HELAA process. It takes account of the most recent updates to the PPG in July 2019.
- 3.5. The document concludes that for West Berkshire, the most appropriate approach to categorisation should be based on location, given the highly diverse nature of settlement and rural character areas with the district.
- 3.6. The starting point for the calculation of the development potential is the whole (gross) site area. To this, a developable area percentage has been applied which varies depending upon the size of the site and the proximity of the site to the built up area, as Figure 3.1 shows below.

⁸ West Berkshire Density Pattern Book (September 2019): <https://info.westberks.gov.uk/evidencebase>

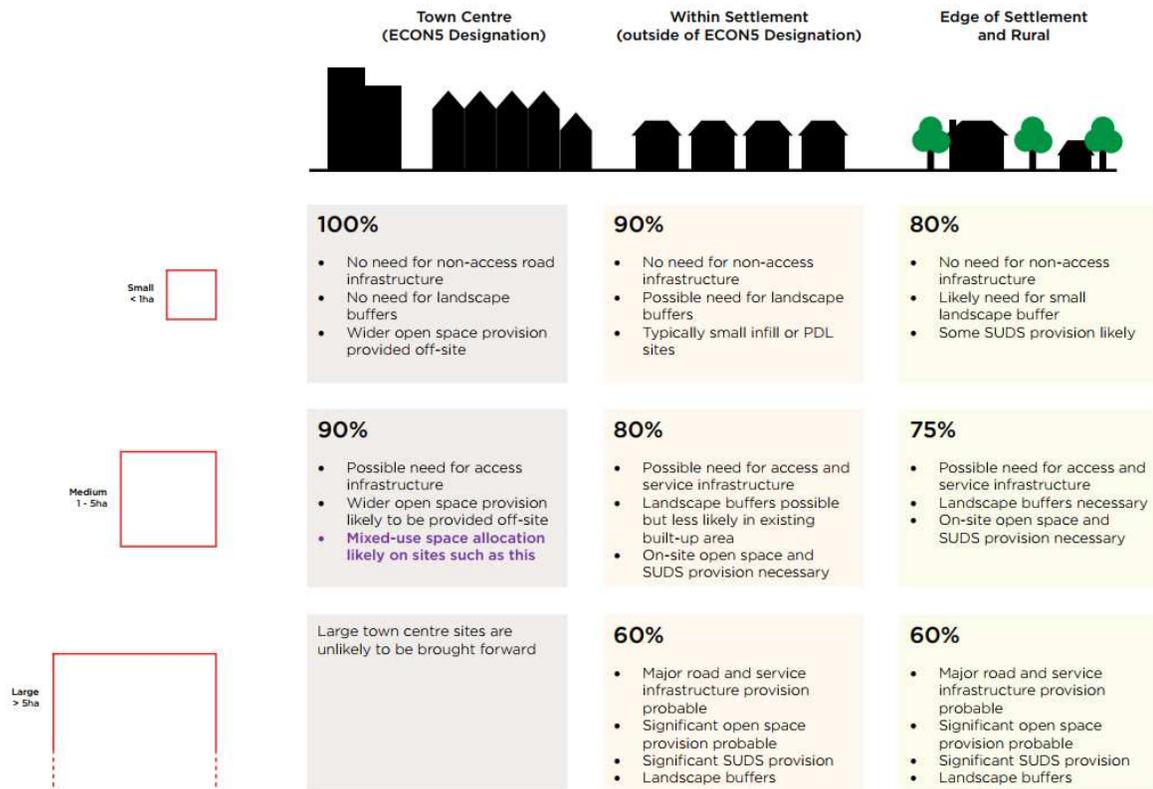


Figure 3.1: Developable area percentages (Source: West Berkshire Density Pattern Book, 2019)

3.7. Once the developable area has been established, a density is applied which varies depending on the location of the site, as illustrated in Figure 3.2:

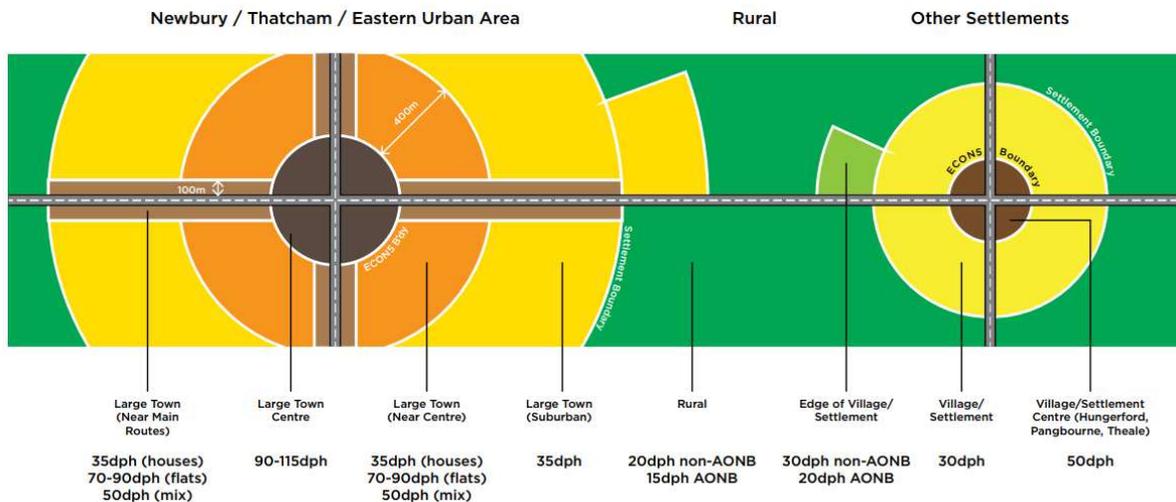


Figure 3.2: Density by location (Source: West Berkshire Density Pattern Book, 2019)

3.8. Therefore, a 4ha site within the town centre of Hungerford would have a developable area percentage of 80% applied. This gives a developable area of 3.2ha. The density

by location is 50 dwellings per hectare. The development potential is therefore 160 dwellings:

$$3.2ha * 50 \text{ dwellings per hectare} = 160 \text{ dwellings.}$$

- 3.9. It should be noted that several sites have been promoted which lie partially within a settlement boundary and partially outside. In these cases, the development potential for each separate area has been calculated and then added together to ascertain the development potential for the whole site.
- 3.10. If the site promoter has suggested a development potential that is lower than that calculated via the Density Pattern Book, this has been used. If the potential suggested is higher, then the density pattern book has been used.
- 3.11. Some promoters suggested a developable area. To be consistent in the calculation of the development potential, it has been decided to use the whole site area as the starting point.
- 3.12. For sites that have an existing allocation within a development plan document, the number of dwellings allocated for has been used.

Specialist residential (C2) uses

- 3.13. The development potential of sites proposing C2 uses has been calculated by reviewing the average plot size per bed space of recent completed developments / approved applications:

Planning application reference	Address	Site area (ha)	Bed spaces
19/00344/COMIND	Winchcombe Place, Newbury	0.65	80
17/01446/COMIND	Monks Lane, Newbury	0.58	64
19/00344/COMIND	Stoneham's Farm, Long Lane, Tilehurst	1.1	85
16/03562/OUTD	Upcot, Tydehams, Newbury	0.31	25

Table 3.1 Recent completed C2 developments/approved applications

- 3.14. The average plot size per bed space of these is 0.01ha, e.g. a plot size of 1ha would be required for a care home of 100 bedspaces.

Employment (B-class) uses

- 3.15. For sites proposing employment (B-class) uses, floorspace figures have been calculated using technical information on plot ratios included in the council's emerging employment evidence base documents, as Table 3.1 shows below. This evidence will be published later in 2020.

- 3.16. If a site promoter has not specified the type of employment use, i.e. office, industrial, or warehousing, the potential for all such uses has been estimated. It will be assumed that either B1a/b OR B1c/B2/B8 will be delivered.

	Office (B1a/b)	Industrial (B1c/B2/B3)
Town centre	0.6	n/a
Out of centre	0.4-0.6	n/a
All locations	n/a	0.4

Table 3.2: Plot ratios by location (Source: Draft Employment Land Review, 2020)

Residential and employment mix

- 3.17. For sites proposing a mix of residential and employment and where the land take has not been specified by the promoter, a split of 50% residential and 50% employment has been assumed.
- 3.18. For sites with planning permission (including where an application was undetermined at the base date of 1 April 2019 but permission was granted during the drafting of the HELAA), the development set out in the permission is taken as being the development potential of the site.

Retail, leisure, community, and renewable energy uses

- 3.19. No development potential has been calculated for these sites at this stage. A total of 18 sites has been promoted for these uses.

Mix of uses (excluding just employment and residential):

- 3.20. If the site promoter has not specified the land take for each proposed use, then the whole site area is divided by the number of uses proposed. However open space and infrastructure (including community facilities) is excluded as these are taken account of in the density pattern book approach.

In cases where several different land uses have been suggested, when calculating the developable residential area, the percentage is based on the whole site area rather than the land take for residential. For example:

The whole site area of Site X is 20ha. As per the density pattern book, because this is above 5ha and on the edge of settlement, the developable area percentage is 60.

5 different uses have been proposed including residential, so the land take is 4ha per use.

60% of 4ha = 2.4ha.

Residential and open space mix

- 3.21. If the promoter has not specified the amount of open space, then the density pattern book approach is used.

If the promoter has specified an amount of open space, then the starting point is the area of land minus the open space. There will be double counting of open space, but there is no evidence at this stage to justify taking an alternative approach.

'Residential-led' developments where land take not specified

- 3.22. As per the material submitted via the call for sites, if the site is being promoted for residential use as a first choice and other uses as a second choice then residential use on the whole site is assumed and the density pattern book is used.

If the site is being promoted for all other uses as first choices, then the mix of uses approach set out above is applied i.e. the land take is split by the number of uses proposed, apart from open space and infrastructure (including community facilities).

Sites with planning permission

- 3.23. The development potential should be the number of dwellings that has been granted planning permission. This will apply to sites like Tull Way, and the Stratfield Mortimer NDP allocated site.
- 3.24. If an application has been refused or is pending determination, the Density Pattern Book, employment calculation, etc. has been used.

Step 2b: Assessing suitability

- 3.25. The purpose of this step is to assess whether a site is suitable for development. Information relevant to the assessment of the remaining sites has been assembled. This information came from the following sources:

- Existing information on designations related to matters such as wildlife and heritage;
- Strategic Flood Risk Assessment
- Surveys of sites;
- Previous planning history
- Input from numerous specialist advisors:

West Berkshire Council	External organisations
Archaeology	Affinity Water
Conservation	Atomic Weapons Establishment
Education	Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust
Emergency Planning	Canal and River Trust
Flooding	Clinical Care Commissioning Group
Green Infrastructure	Environment Agency
Highways Development Control	Great Western Railway
Minerals and Waste	Highways England
Sports and Leisure	National Grid
Drainage Team	Natural England
Transport Services	North Wessex Downs Area of Outstanding Natural Beauty
Transport Policy	Pipelines
Public Health	Sport England
	Thames Water
	Thames Valley Environmental Records Centre
	Scottish and Southern Electricity

Table 3.3: List of internal and external consultees

- 3.26. The volume of information collected from these sources was very significant, running to several thousand pages. In order to present this information in the most user friendly format, it has been tabulated into spreadsheets.
- 3.27. The information was then considered in stage 2 to inform site suitability. In some instances, where information from specialist advisors would not impact on site suitability, it will be carried forward to be considered later in the local plan review process to inform site selection, e.g. information from a utilities provider would not render a site unsuitable, however it will be considered when looking at cumulative impacts as part of the site selection process.
- 3.28. Sites have been assessed using the latest information available at the time of assessment. This is a comprehensive assessment, considering a range of factors:

Land use/AONB

- Whether the site is within the settlement hierarchy
- Relationship to settlement boundary
- Whether the site is previously developed
- Whether the site is located within the AONB
- Whether development would result in harm to the AONB

Highways and access

- Whether suitable access could be achieved
- Whether development would have an impact on highway capacity

Flooding

- Which flood zone the site is located in – this information is taken from the Level 1 Strategic Flood Risk Assessment. Supplementary, more general, comments from the council's drainage team have also been provided
- Whether the site is at risk of fluvial flooding – this information is taken from the Level 1 Strategic Flood Risk Assessment.
- Whether the site is at risk from surface water flooding – using comments from the council's drainage Team
- Whether the site is at risk from groundwater flooding – using comments from the council's drainage Team

Recreation provision

- Whether site is defined as public open space
- Whether site is designated as a local green space
- Whether development would be able to increase open space/outdoor sport facilities and achieve minimum standards of onsite public open space provision

Supporting economic growth

- Whether development would result in the loss/partial loss of land associated with the racehorse industry

- Whether development would result in the loss of part of a protected employment area (PEA)
- Whether development would protect the hierarchy of centres, support the vitality and viability of town, district, local and village centres
- Whether development would result in the loss of the best and most versatile agricultural land

Air quality, pollution and contamination

- Whether site is within or near to an Air Quality Management Area (AQMA), A34 or M4?
- Whether development would result in worsening air quality
- Whether the site is contaminated
- Whether the site is subject to potential noise and disturbance

Landscape character and historic environment

- Whether development would be appropriate in the context of the existing settlement form, pattern and character of the landscape
- Whether development would lead to harm or loss of significance of a listed building, scheduled monument, registered park or garden, or registered battlefield
- Whether development would harm the special architecture or historic interest of a conservation area
- Whether development would harm undesignated heritage assets identified in the Historic Environment Record (HER)

Biodiversity and green infrastructure

- Whether the site offers opportunity for green infrastructure delivery
- Whether development would result in the loss of any identified green infrastructure
- Whether development would have adverse nature conservation impacts which may be capable of avoidance or mitigating
- Whether there are trees on site or immediately adjacent protected by a Tree Preservation Order (TPO)

Minerals and Waste

- Whether site is allocated or safeguarded in the Replacement Minerals and Waste Local Plan for West Berkshire
- Whether site is proposed for allocation or safeguarding in the new Minerals and Waste Local Plan

Additional considerations

- Local Plan history, e.g. whether site considered in the Strategic Housing Land Availability Assessment.
- Relevant planning history.

3.29. Taking the advice from specialist advisors and all of the factors outlined in 3.28 into account, a conclusion on overall suitability is reached. As per the joint methodology, each site is classified as 'suitable' / potentially suitable / suitability unknown /

unsuitable. Those sites classified as 'suitable' or 'potentially suitable' or 'suitability unknown' progress to the next stage.

Suitability classification	
Suitable	<ul style="list-style-type: none"> The site offers a suitable location for development and there are no known constraints which significantly inhibit development for the defined use.
Potentially suitable	<ul style="list-style-type: none"> The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use.
Suitability unknown	<ul style="list-style-type: none"> The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use.
Unsuitable	<ul style="list-style-type: none"> The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.

Figure 3.1: Suitability classification (Source: Berkshire HELAA Methodology)

- 3.30. The existence of single or multiple constraints does not mean that a site is 'unsuitable'. Instead a view is formed on balance, considering the site and any constraints as a whole. Similarly, a classification of 'suitable' or 'potentially suitable' does not mean that a particular development is suitable nor that planning permission will be granted on the site in the future.
- 3.29. No sites have been considered 'unsuitable' because of worsening air quality, pollution or contamination issues. The council will need to consider this further as part of site selection work and will also commission an air quality assessment to inform this work.
- 3.30. No sites have been considered 'unsuitable' because they contain the best and most versatile agricultural land. The methodology states that such land will generally be unsuitable, with exceptions potentially occurring e.g. where there are specific sustainability options. The baseline data set for agricultural land classification confirms that only a small percentage of the agricultural land in the district has been subject to detailed surveying. Depending on other constraints, relevant sites which have not been deemed 'unsuitable' may be subject to further assessment relating to agricultural land classification if required. Consideration would also be given as to whether an exception would be applicable.
- 3.31. In some instances, a site cannot be considered 'unsuitable' but also cannot be considered 'suitable' based on the information being considered, i.e. it will be 'potentially suitable' or 'suitability unknown'. For these sites, further information or additional studies will be required. Following publication of the HELAA, work will commence on gathering further information and undertaking additional studies e.g. landscape sensitivity assessments, heritage impact assessments, transport modelling and archaeological desk-based assessments. Depending on where sites are located, it may be up to the district council or a neighbourhood development plan group to undertake these assessments.

Step 2c: Assessing availability

- 3.32. As per the PPG, a site is considered available when, on the best information available, there is confidence that there are no legal or ownership problems, e.g. ransom strips, tenancies, existing uses requiring relocation, unresolved multiple ownerships.
- 3.33. The ‘Call for Sites’ form included questions on the availability of the site. Where required, this information has been supplemented with additional information from the landowner and considering all the information, a conclusion on overall availability is reached. Only sites considered ‘available’ or ‘potentially available’ progress to the next stage.

Availability classification	
Available	<ul style="list-style-type: none"> Confirmation of availability within the next 15 years has been received from the landowner and there are no known legal issues or ownership problems.
Potentially available	<ul style="list-style-type: none"> The landowner or a third party with an interest has promoted the land but confirmation has not been received from the landowner that the land will be available within the next 15 years. The land is in multiple ownerships and may have site assembly issues. The land accommodates an existing use which would require relocation but arrangements are not in place to achieve this.
Availability unknown	<ul style="list-style-type: none"> The landowner has not expressed an interest in promoting the site. Landownership remains unknown following investigations. The landowner has expressed an interest in promoting the site in the past but has not responded to subsequent enquires for a period no shorter than three years. The land is subject to legal issues upon which further information is required before a robust decision can be made on availability.
Not available	<ul style="list-style-type: none"> The landowner has confirmed that the land is not available for development in the next 15 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15 years.

Figure 3.2: Availability classification (Source: Berkshire HELAA Methodology)

Step 2d: Assessing achievability

- 3.34 As per the PPG, a site is considered achievable where there is a reasonable prospect that the particular type of development will occur at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.
- 3.35 The PPG states that while plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage; it is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant⁹.

⁹ See paragraph 006 Reference ID: 10-006-20190509

- 3.36 The information provided in the 'call for sites' forms regarding availability was also used to arrive at conclusions regarding achievability. This does mean that some assumptions were made on the basis of best information available. Only sites considered 'achievable' or 'potentially achievable' progress to the next stage.

Achievability classification	
Achievable	There is a reasonable prospect that the site will be developed for the defined use within the next 15 years.
Potentially achievable	The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.
Achievability unknown	The site is subject to issues upon which further information is required before a robust decision can be made on achievability.
Unachievable	There is no reasonable prospect that the site will be developed for the defined use within the next 15 years.

Figure 3.3: Achievability classification (Source: Berkshire HELAA Methodology)

Summary

- 3.37 Appendix 4 sets out this assessment process for each site and the resulting conclusions on suitability, availability and achievability. Sites can be categorised as 'developable' (within 5 years), deliverable (within years 6-10 and 11-15), potentially developable' or 'not developable' within the next 15 years.

4 Stage 3: Windfall Assessment

- 4.1 The HELAA methodology allows for the inclusion of a windfall allowance. Windfalls are defined in the NPPF as sites not specifically identified in the development plan. The NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected trends.
- 4.2 The Council has included an allowance for windfalls in the calculation of the 5 year housing land supply and believes there is a clear case for an allowance for the longer plan period. Over the current plan period so far (2006-2019), an average of 378 residential units each year have been completed on land that has not been identified in the development plan (See Table 4) The vast majority of these are on previously developed land within settlement boundaries. Settlement boundaries have been defined to identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.

Monitoring Year	Large non-allocated sites (10 or more units and 1ha or more)	Medium non-allocated sites (10 or more units and under 1 ha)	Small non-allocated sites (less than 10 units)	Total non-allocated sites
2006/07	313	159	202	674
2007/08	216	33	198	447
2008/09	100	217	161	478
2009/10	25	99	115	239
2010/11	40	46	113	199
2011/12	5	31	126	162
2012/13	223	211	118	552
2013/14	102	103	125	330
2014/15	-24	135	245	356
2015/16	40	277	125	442
2016/17	122	117	163	402
2017/18	40	139	134	313
2018/19	25	158	139	322
Annual Average 2006 - 2019	94	133	151	378

Table 4.1: Net Windfall Completions over the Plan Period (April 2006 – March 2019)

- 4.3 The current Local Plan did not allocate any sites within settlement boundaries as the principle in favour of development was already established. If this approach is followed in the Local Plan Review there is justification for a significant windfall allowance in the supply for sites that will continue to come forward in the sustainable settlements of the District. The NPPF at paragraph 68(c) states that local planning authorities should:

“Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlement boundaries for homes”.

- 4.4 The figures in Table 4.1 include completions on sites identified through the prior approval process. In May 2013 changes were made at a national level to permitted development rights which permits the change of use from an office (B1a) to residential use (C3) via a prior approval process rather than a planning application. This change was initially proposed to be a temporary change with residential use started by May 2016, but has now become a permanent change.
- 4.5 In considering how the windfall allowance for the plan period should be calculated, it is considered that completions through permitted development should not be relied upon in calculating a windfall allowance for the longer term of the Local Plan Review period. Table 4.2 shows the level of windfall development since 2006, excluding that from prior approvals.

Monitoring Year	Large non-allocated sites (10 or more units and 1ha or more)	Medium non-allocated sites (10 or more units and under 1 ha)	Small non-allocated sites (less than 10 units)	Total non-allocated sites
2006/07	313	159	202	674
2007/08	216	33	198	447
2008/09	100	217	161	478
2009/10	25	99	115	239
2010/11	40	46	113	199
2011/12	5	31	126	162
2012/13	223	211	118	552
2013/14	102	103	120	325
2014/15	-24	121	215	312
2015/16	40	181	110	331
2016/17	122	94	137	353
2017/18	40	111	127	278
2018/19	25	131	123	279
<i>Annual Average 2006 - 2019</i>	<i>94</i>	<i>118</i>	<i>143</i>	<i>355</i>

Table 4.2: Net Windfall Completions over the Plan Period excluding prior approvals (April 2006 – March 2019)

- 4.6 Though the contribution from large and medium sites is significant, it is considered that these should not be included within the windfall allowance. Development of large, and to a lesser extent, medium sized unallocated sites tends to vary significantly from year to year, compared to the relatively steady level of small site windfall completions. Exclusion of these large and medium sites as well as the prior approvals from the allowance would introduce significant flexibility to the supply. It is considered, however, that there is a clear case for an allowance for small site windfalls. It is logical to assume that these sites will continue to come forward. Over the past 13 years of the plan period an average of 143 small site windfalls (excluding those through the prior approval process) have been completed each year, as set out in Table 4.2 above.
- 4.7 It is therefore considered that a small site allowance of 143 dwellings per year is justified and appropriate, based on past levels of completions. At the current time no allowance is included for sites of 10 or more dwellings. A number of sites of this size within settlement boundaries have, however, been identified in the HELAA and, unless specifically identified in the development plan, will be classified as windfall development. There is therefore the possibility of including an allowance for these

sites or of identifying or allocating in the Local Plan Review without any double-counting with the current windfall allowance.

- 4.8 A total windfall allowance of 143 dwellings per annum is equivalent to only 38% of the average windfall completions over the current plan period to 2019 but is considered a prudent allowance. Excluding the next five year period (where the majority of windfall developments already have planning permission and where the allowance is calculated separately for the five year land supply) the allowance for the period 2024 – 2036 would be a total of 1,716 dwellings. For the period April 2019 to March 2024 an allowance of 362 has been included in the five year housing land supply, meaning a total windfall allowance from 2019 to 2036 of 2,078 dwellings, an average of 122 dwellings per annum.

5 Conclusions

- 5.1 The conclusions of the assessment of capacity when considered against need are set out below.
- 5.2 There is capacity to provide 20,261 to 20,317 dwellings from 2019 to 2036 in West Berkshire district. When considered against identified need, this means there is a no shortfall up to 2036.
- 5.3 However potentially developable sites have been assessed on their own merits and have not been considered cumulatively. For many settlements, there are choices to be made about selecting the most sustainable sites through the development plan process.
- 5.4 There is capacity to provide approximately 279 sq m to 85,639 sq m of offices in West Berkshire between 2019 and 2036.
- 5.5 There is capacity to provide approximately 226,874 sq m to 286,267 sq m of industrial and warehousing space in West Berkshire between 2019 and 2036.
- 5.6 In the case of industry and warehousing, it is considered that there may be scope for considerable on-site expansion within the existing employment areas which has not been fully considered by the HELAA process. Separate work will be undertaken on this, which may mean that there is not a need to seek provision of unmet needs in other areas.
- 5.7 3 sites have been promoted for retail use that are considered to be potentially developable or potentially developable in part. The results of the Retail and Leisure Study were that there was a need for an increase in up to 23,500 sq m. However, this was very much identified as a maximum, given considerable uncertainty in the latter years of the study period. The Council will need to consider whether there are additional opportunities for retail expansion within the plan period.
- 5.8 3 sites have been promoted for leisure use that are considered to be potentially developable or potentially developable in part. The needs for leisure identified in the Retail and Leisure Study 2017 are around qualitative needs for specific facilities, so it may be possible to meet those needs within the context of a decline in overall floorspace.
- 5.9 The full, site-by-site tables for the various stages (1-2d) of the methodology are included in Appendix 4.

	Local Housing Need / Employment floorspace requirements*	Sites with planning permission which have not yet completed at 31 March 2019	Allocated sites in the Core Strategy & Housing Site Allocations Development Plan Document without planning permission at 31 March 2019	Deliverable or deliverable in part sites (a)	Developable or developable in part sites (b)	Potentially developable or potentially developable in part sites (c)	Total (a) + (b) + (c)	Windfall (d)	Total supply	Difference between need and supply
Housing (dwellings)**	9,367 to 10,727	4,275	2,355	21	0	11,532 to 11,588	11,553 to 11,609	2,078	20,261 to 20,317	9,534 to 10,950
C2 Specialist residential (bedspaces)**	599	174	n/a	0	0	5 to 240	5 to 240	n/a	179 to 414	-420 to -185
Housing for Gypsies, Travellers and Travelling Showpeople	n/a	n/a	24 plots	n/a	n/a	n/a	24 plots	n/a	24 plots	n/a
B1a Office (sq m)**	n/a	-14,003 to -9,925	n/a	0	0	14,300 to 95,564	14,300 to 95,564	n/a	297 to 85,639	n/a
B1c/B2/B8 Industrial and warehousing (sq m)**	n/a	46,394 to 49,043	n/a	0	0	180,480 to 237,224	180,480 to 237,224	n/a	226,874 to 286,267	n/a
A1 Retail (sq m)**	23,500	2,388 to 2,788	n/a	0	0	3 sites^	n/a	n/a	2,388 to 2,788	n/a
D2 Leisure (sq m)	n/a	4,124	n/a	0	0	3 sites^	n/a	n/a	4,124	n/a
C1 Hotel (sq m)	n/a	13,692	n/a	0	0	0	n/a	n/a	13,692	n/a
D1 Community (sq m)	n/a	11,382	n/a	0	0	3 sites^	n/a	n/a	11,382	n/a
Other e.g. renewable energy	n/a	0	n/a	0	0	1 site^	n/a	n/a	n/a	n/a

* Given that this figure will change annually, the Council intends to identify its requirement as a range rather than a single figure. For the purposes of the HELAA, the range of 551-631 dwellings per annum (contained in the Regulation 18 consultation of December 2018) is being used.

** There are some sites which have been proposed for one use or another, eg. residential or specialist residential, B1a or B1c/B2/B8 use. Because of this, a range is shown in some instances.

^ No development potential has been calculated for these sites at this stage so total the number of sites is shown.